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2010 MAY 27 PM 2:51

CLERK US DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY  DEPUTY

JULIA SOROKIN, Pro Se  
LOUIS A. BRAVO, Pro Se  
3895 Clairmont Drive, Suite B#210  
San Diego, CA 92117  
Telephone: (858) 384-3528  
Facsimile: (858) 384-3581

Plaintiffs, Pro Se

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

VIA FAX

PLAINTIFF(s)

JULIA SOROKIN, LOUIS A. BRAVO

v.

DEFENDANT(s)

NEW YORK COUNTY DISTRICT  
ATTORNEY'S OFFICE; Cyrus Vance Jr.  
in his official capacity as DISTRICT  
ATTORNEY OF NEW YORK COUNTY;  
Robert Morgenthau in his former official  
capacity as DISTRICT ATTORNEY OF  
NEW YORK COUNTY; Joanne Siegmund  
in her official capacity as ASSISTANT  
DISTRICT ATTORNEY OF NEW YORK  
COUNTY; CITY OF NEW YORK;  
NEW YORK CITY POLICE DEPARTMENT;  
Terrance Hayes in his official capacity as  
NYPD Detective; CORRECTIONS  
DEPARTMENT OF NEW YORK CITY;  
NEW YORK STATE ATTORNEY  
GENERAL'S OFFICE

Case No. 10 CV 1153 WQH BLM

COMPLAINT UNDER THE CIVIL RIGHTS  
ACT 42 U.S.C. § 1983, FOR INJUNCTIVE  
AND OTHER RELIEF

JURY TRIAL DEMANDED

OK

**PRELIMINARY STATEMENT**

1  
2 1. This action is brought pursuant to 42 U.S.C § 1983 to redress violations of constitutional  
3 rights as secured by the U.S. Constitution to both Plaintiffs Julia Sorokin and her husband Plaintiff  
4 Louis A. Bravo under color of law by the Defendants named in this complaint.

5  
6 2. Both Plaintiffs Julia Sorokin and Louis A Bravo of San Diego, California sue all Defendants  
7 and their employees named in this complaint for an injunction and damages. This action is brought  
8 pursuant to 42 U.S.C § 1983 due to the fact that all of the Defendants and their employees named in  
9 this complaint as Defendants have engaged in violations of constitutional rights as secured by the U.S.  
10 constitution, by authorizing actions in this judicial district or by having employees from their agency or  
11 departments physically present in this judicial district acting under color of law during the false arrest,  
12 unlawful three week prison detention without stating charges, and the unlawful extradition to New  
13 York State of Plaintiff Julia Sorokin a San Diego, California resident on a sealed governor's warrant.

14  
15 3. The Defendants named in this complaint were acting individually or jointly and in  
16 conspiracy, and out of the scope of their employment as well as acting under color of law when they  
17 falsely arrested Plaintiff Julia Sorokin at her home at 101 Market St. San Diego, California over a civil  
18 business website domain name dispute and charged her with aggravated identity theft in New York.

19  
20 4. The Defendants at the District Attorney's Office of New York County and Defendant NYPD  
21 Detective Terrance Hayes had the Plaintiff Julia Sorokin arrested on the false charges of aggravated  
22 identity theft to assist the Dow Jones and Co. and the Wall Street Journal take over the Plaintiff Julia  
23 Sorokin's publishing company.

24  
25 5. The Defendants at the District Attorney's Office of New York County and Defendant NYPD  
26 Detective Terrance Hayes filed a false police report with no victims and proceeded to conduct an out of  
27 state / jurisdiction kidnapping of the Plaintiff Julia Sorokin to bring her to New York City, NY in order  
28

1 to convict her as a New York resident even though she has not committed a crime in New York City,  
2 NY nor is the Plaintiff Julia Sorokin a New York State resident.

3 6. The chief architect of this malicious prosecution and kidnapping under color of law, the  
4 Defendant Former District Attorney Robert Morgenthau has since retired after 35 years of public  
5 service, and secured a position with Wachtell, Lipton, Rosen & Katz. This law firm provides legal  
6 counsel to the Bancroft family, who are the original owners of the Dow Jones & Co. Inc and the Wall  
7 Street Journal.  
8

9 7. The Defendant, Former District Attorney Robert Morgenthau, acting in conspiracy and under  
10 color of law utilized the assistance of all of the other Defendants named in this complaint as well as the  
11 U.S. Marshall's Office and the San Diego County Sheriff's Department to conduct this out of state /  
12 jurisdiction kidnapping of the Plaintiff Julia Sorokin in order to secure a position with Wachtell,  
13 Lipton, Rosen & Katz as well as assist the Dow Jones and Co. The Defendant, Former District Attorney  
14 Robert Morgenthau, was a frequent writer for The Wall Street Journal and received many political  
15 endorsements from The Wall Street Journal in his thirty five years in office.  
16

#### 17 JURISDICTION AND VENUE

18 8. The primary conduct complained of herein occurred in San Diego County, California. This  
19 Court has jurisdiction over this action under the provisions of 18 U.S.C. §1332(a) in that this is an  
20 action between citizens of different states in which the value of the amount in controversy exceeds  
21 \$75,000, exclusive of interest and costs.  
22

23 9. Venue is proper in this district pursuant to 28 U.S.C. §1331 (federal question of jurisdiction);  
24 and 18 U.S.C. §1332, diversity.  
25

26 10. Plaintiffs Julia Sorokin and Louis A. Bravo reside in San Diego, California.  
27  
28

1 11. All Defendants reside in New York State and are employed or were formerly employed in  
2 New York State during the time of the alleged civil rights violations done to both Plaintiffs.

3 12. All acts necessary or precedent to the bringing of this lawsuit occurred in this judicial  
4 district due to the fact that all of the Defendants and their employees named in this complaint as  
5 Defendants have engaged in violations of constitutional rights as secured by the U.S. constitution, by  
6 authorizing actions in this judicial district or by having employees from their agency or departments  
7 physically present in this judicial district acting under color of law during the false arrest, unlawful  
8 three week prison detention without stating charges, and the unlawful extradition to New York of  
9 Plaintiff Julia Sorokin a San Diego, California resident on a sealed governor's warrant.  
10

11 13. This action is brought pursuant to 42 U.S.C § 1983 to redress the deprivation of rights  
12 secured by the United States Constitution under color of law.

13 14. This court has jurisdiction pursuant to 28 U.S.C. § 1331.

14 15. Rule 65 of the Federal Rules of Civil Procedure authorizes injunctive relief.

15 16. Venue is proper under 28 U.S.C. § 1391 (a) (2). A substantial part of the events giving rise  
16 to the claim occurred in the Southern District of California.  
17

18  
19 **THE PARTIES**

20 17. Plaintiff Julia Sorokin is a California resident that has resided in San Diego, California and  
21 Los Angeles, California for over twelve years. Plaintiff Julia Sorokin has been legally married to  
22 Plaintiff Louis A. Bravo and has shared a home and income for over fifteen years.  
23

24 18. Plaintiff Louis A. Bravo is a California resident that has resided in San Diego, California  
25 and Los Angeles, California over twelve years. Plaintiff Louis Bravo has been legally married to  
26 Plaintiff Julia Sorokin and has shared a home and income for over fifteen years.  
27  
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1           19. The New York State Attorney General's Office is named in this complaint as a Defendant  
2 for issuing a governor's extradition warrant upon request from the District Attorney's Office of New  
3 York County for the Plaintiff Julia Sorokin without verifying whether the Plaintiff Julia Sorokin was  
4 actually a fugitive from New York State or if the indictment no: 5257/08 was legally sufficient or valid  
5 to authorize an extradition.  
6

7           20. City of New York is named in this complaint as a Defendant for the civil rights violations  
8 under color of law committed against the Plaintiff Julia Sorokin by members of the New York City  
9 Police Department and the New York City Corrections Department.

10           21. The New York City Police Department (NYPD) is named in this complaint as a Defendant  
11 for the civil rights violations under color of law committed against the Plaintiff Julia Sorokin by NYPD  
12 Defendant Detective Terrance Hayes and others employees as of yet not identified.  
13

14           22. The New York City Department of Corrections is named in this complaint as a Defendant  
15 for the civil rights violations under color of law committed against the Plaintiff Julia Sorokin during her  
16 unlawful detention at the Rikers Island Correctional Facilities in Queens, New York.

17           23. NYPD Detective Terrance Hayes assigned to the District Attorney's Office Squad (DAOS)  
18 is named as a Defendant in this complaint for the civil rights violations and malicious investigation  
19 under color of law committed against the Plaintiff Julia Sorokin. NYPD Detective Terrance Hayes was  
20 the lead detective in the false arrest and kidnapping of the Plaintiff Julia Sorokin from her home at 101  
21 Market Street San Diego, California.  
22

23           24. The New York County District Attorney's Office is named in this complaint as a Defendant  
24 for the civil rights violations, malicious investigation, and malicious prosecution under color of law  
25 committed against the Plaintiff Julia Sorokin. The District Attorney's Office jurisdiction is coextensive  
26 with the island of Manhattan in New York State.  
27  
28

27. Assistant District Attorney of New York County Joanne Siegmund is named in this complaint as a Defendant for the civil rights violations, malicious investigation, and malicious prosecution under color of law committed against the Plaintiff Julia Sorokin.

28. Each Defendant is sued in his or her current or former official capacity, and each acted under color of law and conspiracy within the scope of his or her current or former employment in engaging in the actions alleged in this complaint.

29. On May 31<sup>st</sup> 2008, the Defendants at the District Attorney's Office of New York County and Defendant NYPD Detective Terrance Hayes filed a false police report with the assistance of the Law Offices of Martin Schwimmer and the Dow Jones & Co.

30. This police report was filed in the NYPD 5th police precinct across the street from the District Attorney's Office of New York County in order to assist the Law Offices of Martin Schwimmer and his client the Dow Jones & Co. gain an advantage over the Plaintiff Julia Sorokin, a California publishing business owner who was having a website domain dispute with the Law Offices of Martin Schwimmer and the Dow Jones & Company Inc..

1           31. On March 5<sup>th</sup>, 2008, the Dow Jones & Company Inc. the parent company of the Wall Street  
2 Journal, with the assistance of the Law Offices of Martin Schwimmer fraudulently had just taken over  
3 all of the Plaintiff Julia Sorokin's business website urls and emails in California without her knowledge  
4 and The Wall Street Journal was about to launch their new magazine WSJ Magazine after stealing the  
5 idea from Plaintiff Julia Sorokin's California magazine called WSJ Media.  
6

7           32. On or about May 15<sup>th</sup>, 2008, The Dow Jones & Company Inc. and the Law Offices of  
8 Martin Schwimmer used their connection with the Defendant Robert Morgenthau, the former District  
9 Attorney of New York County to destroy the character and frame the Plaintiff Julia Sorokin so that she  
10 would not be able to file a civil lawsuit against the Dow Jones & Company Inc and the Wall Street  
11 Journal for the stealing her business idea and her website urls and business emails.  
12

13           33. The Dow Jones & Company Inc. and the Law Offices of Martin Schwimmer had a direct  
14 connection with the Defendant Robert Morgenthau, the former District Attorney of New York County  
15 due to the fact he was a frequent writer for The Wall Street Journal and received many political  
16 endorsements from The Wall Street Journal in his thirty five years in office.  
17

18           34. The District Attorney's Office of New York County under the direction of the Defendant  
19 Robert Morgenthau and acting under conflict of interest, color of law and conspiracy, ordered both  
20 Defendant ADA Joanne Siegmund and Defendant NYPD Detective Terrance Hayes and other staff  
21 members to start a malicious criminal investigation of Plaintiff Julia Sorokin, a California resident and  
22 business owner for the non existing crimes of owning website urls and business emails that are similar  
23 to the Wall Street Journal newspaper. This action turned a civil domain name dispute into a malicious  
24 felony police investigation.  
25  
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**The Missing False Police Report**

35. The police report that was filed accusing the Plaintiff Julia Sorokin of false crimes has since gone missing by the Defendants at the District Attorney's Office of New York County. By conducting a six month investigation, the Plaintiffs have discovered the following criminal acts conducted by the Defendants at the District Attorney's Office of New York County and Defendant NYPD Detective Terrance Hayes:

1. The police report states no victims of a crime only PSNY (Penal Statue New York).
2. The police report was filed by the Defendants at the District Attorney's Office of New York County and Defendant NYPD Detective Terrance Hayes and attorney Martin Schwimmer, who was not a victim of a crime or a witness to a crime, making this a false police report.
3. The police report states that the crime happened at 9:00 AM May, 31<sup>st</sup> 2008.
4. The police report also states the complaint was filed at 9:00 AM May, 31<sup>st</sup> 2008.
5. The police report states the location of the alleged crime happened in a commercial building in New York City, but does not give the address of this commercial building.
6. The police report was filed across the street from the District Attorney's Office of New York County building.
7. The police report has disappeared after the Plaintiffs requested it from the Defendant ADA Joanne Sigmund during pre-trial discovery.
  - A copy of the Plaintiff Julia Sorokin's New York City Police arrest report proving the filing of a false police report is attached as Exhibit A.

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**Defendant NYPD Detective Terrance Hayes Actions Under Color of Law**

36. After several months of illegal searches of bank accounts and emails without a search warrant, the Defendant NYPD Detective Terrance Hayes failed in finding any way to tie the Plaintiff Julia Sorokin to a crime in New York City and decided to charge the Plaintiff Julia Sorokin with the false crime of aggravated personal identity theft of newspapers, for owning website urls and business emails that are similar to the Wall Street Journal and the New York Times. Both newspapers were publishing vendors of the Plaintiff Julia Sorokin's publishing company in California.

37. Since he could not locate the Plaintiff Julia Sorokin home address in California, Defendant NYPD Detective Terrance Hayes then left his jurisdiction with a plan to deceive the Plaintiff Julia Sorokin's parents into giving up the Plaintiff Julia Sorokin's contact information in California with a false story that a Bank of America employee has stolen the Plaintiff Julia Sorokin's personal identification and is cashing checks in New York City with Plaintiff Julia Sorokin's identification and he is there to inform the Plaintiff Julia Sorokin of the crime being done against her.

38. The Plaintiff Julia Sorokin's elderly parents told the Defendant NYPD Detective Terrance Hayes that the Plaintiff Julia Sorokin will contact him regarding this situation and gave the Detective the Plaintiff Julia Sorokin's contact information so he can follow up on the situation with her.

39. When Plaintiff Julia Sorokin called Defendant NYPD Detective Terrance Hayes the next day, from her cell phone in San Diego, California, Defendant NYPD Detective Terrance Hayes told her the same false story of a lady at Bank of America stealing her personal identification. He said he went to her parents' home to inform her of this crime of identity theft being done against her.

40. Plaintiff Julia Sorokin then asked Defendant NYPD Detective Terrance Hayes if she was in any trouble and if she needs to come to New York City with her attorney. Defendant NYPD Detective Terrance Hayes told Plaintiff Julia Sorokin that she does not need to come to New York City and that

1 she is not in any trouble at all. He said he is in the process of tracking down this criminal who is using  
2 Plaintiff Julia Sorokin's personal identification and he is sure he will catch "this criminal".

3 41. Defendant NYPD Detective Terrance Hayes instructed Plaintiff Julia Sorokin not to come to  
4 New York City or to seek legal representation so that he can entrap her and make her look like a  
5 fugitive from New York City, NY. He did this in order to strengthen his false arrest case since he had  
6 no jurisdiction in California.  
7

8 42. Defendant NYPD Detective Terrance Hayes needed to provide the Defendants at the  
9 District Attorney's Office of New York County with a method to kidnap the Plaintiff Julia Sorokin to  
10 New York City to face false charges and make her look like a fugitive on the run from New York.  
11

12 **The Defendants at the District Attorney's Office of New York County of**

13 **New York County Deceive the Grand Jury**  
14

15 43. Defendant ADA Joanne Siegmund at this same time is working with other members of the  
16 District Attorney's Office of New York County and the attorney Martin Schwimmer who was  
17 representing the Wall Street Journal in order to get a felony indictment from the Grand Jury of New  
18 York City for the Plaintiff Julia Sorokin, a California resident.

19 44. Attorney Martin Schwimmer, representing the Wall Street Journal, was used in place of a  
20 victim of aggravated personal identity theft in front of the Grand Jury by stating he was representing  
21 the victims of aggravated personal identity theft in New York. This tactic was used under the color of  
22 law, in order to deceive the Grand Jury and secure the indictment / arrest warrant, against the Plaintiff  
23 Julia Sorokin.  
24

25 45. This is a major act of prosecutor misconduct, corruption, as well as conflict of interest. The  
26 acts of presenting false and fabricated evidence and witnesses to a Grand Jury are felony crimes.  
27  
28

1           46. After being presented with fabricated evidence and false testimony by attorney Martin  
2 Schwimmer, the Grand Jury granted the felony indictment for Grand Larceny, Forgery, and Aggravated  
3 Identity Theft to the Defendants at the District Attorney's Office of New York County for Plaintiff  
4 Julia Sorokin.

5           47. Defendant Robert Morgenthau then requested a governor's extradition warrant from the  
6 Defendant the New York State Attorney General's Office, this warrant was then sealed.

7           48. He did this so that Plaintiff Julia Sorokin could be kidnapped under color of law from her  
8 home at 101 Market Street San Diego, California without knowing her charges and forcing her to waive  
9 her rights to extradition in order to come to New York City to face false charges. The warrant number  
10 is F2008100586.  
11

12           49. Defendant NYPD Detective Terrance Hayes is then given the full authorization and funding  
13 to kidnap the Plaintiff Julia Sorokin to make her look like a fugitive who was running from New York,  
14 in order to satisfy the lack of jurisdiction that the Defendants at the District Attorney's Office had over  
15 a California resident.  
16

17  
18           **The Police Misconduct and Civil Rights Violations of the San Diego Sheriff's Dept.**

19           50. The Defendant NYPD Detective Terrance Hayes under color of law contacts Detectives  
20 Julio Sandoval and Carlos Vasquez of the San Diego, California Sheriff's Office fugitive recovery  
21 division to assist in the kidnapping of the Plaintiff Julia Sorokin.  
22

23           51. Detectives Julio Sandoval and Carlos Vasquez are not told of the charges against Plaintiff  
24 Julia Sorokin or of her health condition of being three months pregnant, but are provided with a copy of  
25 the Plaintiff's Julia Sorokin drivers license taken without a warrant from the Plaintiff Julia Sorokin's  
26  
27  
28

1 bank account profile. The Detectives Julio Sandoval and Carlos Vasquez also received the fax copy of  
2 the sealed governor's warrant from the Defendant NYPD Detective Terrance Hayes.

3 52. On the night of December 2<sup>nd</sup> 2008 at around 4:00 pm, both Plaintiffs were at their home at  
4 101 Market Street, San Diego, California when the Plaintiff Julia Sorokin decided to get some food and  
5 medicine in the neighborhood supermarket when she was attacked by both Detectives Julio Sandoval  
6 and Carlos Vasquez.

7  
8 53. At first the Plaintiff Julia Sorokin thought that she was being robbed in her doorway of her  
9 building since both Detectives Julio Sandoval and Carlos Vasquez did not have police uniforms and did  
10 not identify themselves as police officers.

11 54. The Detectives Julio Sandoval and Carlos Vasquez assaulted the Plaintiff Julia Sorokin a  
12 five foot two inches, three months pregnant woman that only weighed 110 pounds with the use of  
13 extreme violence and the use of a Tasser gun.

14  
15 55. Plaintiff Julia Sorokin then realized the Detectives Julio Sandoval and Carlos Vasquez were  
16 police officers when they asked her to identify herself. Once she told them her name, she was  
17 handcuffed and physically searched in the street in front of her neighbors by the male officers.

18 56. The Plaintiff Julia Sorokin then asked the Detectives Julio Sandoval and Carlos Vasquez if  
19 she was being arrested and they did not answer. The Plaintiff then asked for her charges and what are  
20 her rights and the Detectives Julio Sandoval and Carlos Vasquez told her to shut up or they will use the  
21 Taser gun on her while wearing hand cuffs and not resisting.

22  
23 57. The Plaintiff was then thrown in the back of a unmarked van driven by the Detectives Julio  
24 Sandoval and Carlos Vasquez and was not taken to be processed as required by California prisoner  
25 handling laws and regulations, but instead was driven around San Diego in handcuffs with no female  
26 officer present.

1           58. The Detectives Julio Sandoval and Carlos Vasquez used this time to search and interrogate  
2 the Plaintiff Julia Sorokin outside of the city limits of San Diego without an attorney present with  
3 further threats of violence and a Tasser gun while the Plaintiff Julia Sorokin was handcuffed.

4           59. The Detectives Julio Sandoval and Carlos Vasquez were acting under color of law and in  
5 direct violation of constitutional rights of the Plaintiff Julia Sorokin when instead of taking her to be  
6 processed, where she can call her attorney, they took her to the Las Colinas Women Detention Facility,  
7 a women's prison outside of the city of San Diego California.

8           60. After several hours of searching for his missing pregnant wife, Plaintiff Louis A. Bravo  
9 went to the San Diego Police Department for assistance. Once he gave them all her information, they  
10 informed him that she has been taken to the Las Colinas Women Detention Facility and that the  
11 Plaintiff Julia Sorokin will be extradited to New York City, NY on a sealed governor's extradition  
12 warrant number F2008100586.  
13

14           61. The San Diego Police Department also did not know the charges of the warrant since they  
15 were not informed of this illegal kidnapping in their jurisdiction. Defendant NYPD Detective Terrance  
16 Hayes utilized Detectives Julio Sandoval and Carlos Vasquez to conduct this illegal kidnapping and  
17 interrogation of the Plaintiff Julia Sorokin, a California resident.  
18

19  
20           **Las Colinas Women Detention Facility Misconduct and Civil Rights Violations**  
21

22           62. On or around 5:30 pm on December 2<sup>nd</sup>, 2008, The Plaintiff Julia Sorokin was handed to  
23 the Las Colinas Women Detention Facility a San Diego County Jail operated by the Sheriff's  
24 Department of San Diego County. The Plaintiff Julia Sorokin was given no medical care for her  
25 condition after the violent arrest, and was subjected to no food and water for over 12 hours.  
26  
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28

1           63. When the Plaintiff Julia Sorokin, on or about December 5<sup>th</sup>, 2008 went before the Judge in  
2 San Diego, California wearing chains and prison clothing, the Judge stated he does not know her  
3 charges and he can't help her due to the sealed governor's extradition warrant. He then sent her back to  
4 prison where the Plaintiff Julia Sorokin was held until her extradition to New York, on December 16<sup>th</sup>,  
5 2008.  
6

7  
8                   **The Extradition from San Diego, California to New York City, New York**

9                   **Police Misconduct and Civil Rights Violations**

10           64. After two weeks in a San Diego County Prison, without knowing her charges, Plaintiff Julia  
11 Sorokin was told that she would be picked up by Defendant NYPD Detective Terrance Hayes. When  
12 Defendant NYPD Detective Terrance Hayes showed up, on or around December 16<sup>th</sup>, 2008 at 5:30 pm,  
13 with Detectives Julio Sandoval and Carlos Vasquez he put a man's sweater and chains on the Plaintiff  
14 Julia Sorokin during a very hot day in Southern California.  
15

16           65. Prior to the extradition the Defendant NYPD Detective Terrance Hayes spent several hours  
17 in San Diego, CA with Detectives Julio Sandoval and Carlos Vasquez searching the Plaintiffs San  
18 Diego, CA home at 101 Market Street San Diego, California without a search warrant.  
19

20           66. At the San Diego Airport Defendant NYPD Detective Terrance Hayes called Defendant  
21 Assistant District Attorney Joanne Siegmund at her home and told her "I got her, Ms. Siegmund". The  
22 Plaintiff Julia Sorokin was then kept in that sweater and chains for the entire duration of the extradition  
23 even when she was passing out from wearing the hot sweater and being three months pregnant.

24           67. During the nine hour extradition period, which involved a two hour wait in the airport, and  
25 an almost seven hour flight from San Diego to New York, Plaintiff Julia Sorokin was only allowed to  
26 use the restroom three times.  
27  
28

1           68. CCVT / Security cameras at the San Diego airport shows the Plaintiff Julia Sorokin in this  
2 condition in chains while being forced to walk the entire way to the airplane by Defendant NYPD  
3 Detective Terrance Hayes in front of hundreds of people and airport staff members.

4           69. After a cross country flight in that sweater and chains, Defendant NYPD Detective Terrance  
5 Hayes forced the Plaintiff Julia Sorokin to walk into freezing cold temperatures wearing only shower  
6 sandals, summer pants, and the man's sweater he forced on her in San Diego, California.

7           70. CCVT / Security cameras at the New York airport and parking lot shows the Plaintiff Julia  
8 Sorokin in this condition in chains while being forced to walk to the Defendant NYPD Detective  
9 Terrance Hayes snowed in car in the airport parking lot.

10           71. Defendant NYPD Detective Terrance Hayes then forced the Plaintiff Julia Sorokin to stand  
11 in the freezing temperature outside of the airport in her condition wearing no winter protective clothing  
12 or adequate footwear, while Defendant NYPD Detective Terrance Hayes removed snow and ice off his  
13 personal car. Defendant NYPD Detective Terrance Hayes is seen wearing winter clothing on camera.

14           72. Defendant NYPD Detective Terrance Hayes female NYPD partner is also seen on the  
15 camera standing there in winter clothing while Defendant NYPD Detective Terrance Hayes removed  
16 snow and ice off his personal car.

17           73. Plaintiff Julia Sorokin had no winter clothing or shoes during this extradition since  
18 Defendant NYPD Detective Terrance Hayes kept the details of Plaintiff Julia Sorokin whereabouts off  
19 the record and secret from her attorney and family for several days preventing them from providing  
20 protective clothing for the freezing temperatures in New York City.

21           74. Defendant NYPD Detective Terrance Hayes then further violated the Plaintiff Julia  
22 Sorokin's rights by taking the Plaintiff Julia Sorokin to another prison in New York City, not a Judge in  
23 night court or police processing center called Central Booking in New York City.

1           75. Defendant NYPD Detective Terrance Hayes and every police officer in the United States of  
2 America are required by law and police regulations to take a prisoner to a processing center, and then to  
3 a Judge to hear his / her charges.

4           76. Without knowing her charges, and not being told her rights, and not seeing a Judge  
5 Defendant NYPD Detective Terrance Hayes took Plaintiff Julia Sorokin to Rikers Island Correctional  
6 Facility a prison in another county of New York State, on or about 4:00 am on December 17<sup>th</sup>, 2008.

7           77. The Plaintiff Julia Sorokin was then forced to endure a second prison intake without  
8 knowing her charges, nor seeing a Judge or being processed at Central Booking. All this was done to  
9 avoid having Plaintiff Julia Sorokin speak to her attorney in Central Booking New York City prior to  
10 arraignment.  
11

12           78. Rikers Island Correctional Facilities then violated prisoner intake rules and regulations of  
13 the Corrections Department of the City of New York by taking the Plaintiff Julia Sorokin without being  
14 processed as a favor to the Defendants at the District Attorney's Office of New York County and  
15 Defendant NYPD Detective Terrance Hayes.  
16

17           79. The intake Corrections Officer Porter told Defendant NYPD Detective Terrance Hayes that  
18 he has to go to Central booking but he told her it's closed for the night and the intake Corrections  
19 Officer Porter then took Plaintiff Julia Sorokin into custody, violating prisoner intake rules and  
20 regulations of the Corrections Department of the City of New York as well as violating Plaintiff Julia  
21 Sorokin's constitutional rights by keeping her location unknown to her attorney.  
22

23           80. In New York City, according to police regulations, an arresting officer must stay with his or  
24 her prisoner until the prisoner is processed at Central Booking even if it is overnight. Defendant NYPD  
25 Detective Terrance Hayes said he felt tired after a seven hour flight and since he also lives in that same  
26  
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1 county outside New York City as the Rikers Island Correctional Facility, which is in Queens County,  
2 he decided to hide the Plaintiff Julia Sorokin off the system while he went home to get some rest.

3 81. After spending the night in Rikers Island Correctional Facility Plaintiff Julia Sorokin was  
4 then taken to The New York County Supreme Court for her second arraignment without speaking to  
5 her attorney or knowing her charges. The Plaintiff Julia Sorokin has now been in prison detention for  
6 over 400 hours in two states due to this kidnapping under color of law.  
7

8 82. On or about December 18<sup>th</sup>, 2008, at 11:30 am, Plaintiff Julia Sorokin was handed back over  
9 to Defendant NYPD Detective Terrance Hayes who then placed the Plaintiff Julia Sorokin in a holding  
10 cage in his office not with other prisoners where her attorney could not get access to her.

11 83. Defendant NYPD Detective Terrance Hayes then fingerprinted the Plaintiff Julia Sorokin  
12 without telling her the charges or letting her speak to her attorney. Defendant NYPD Detective  
13 Terrance Hayes refused to state the charges and let the Plaintiff Julia Sorokin see her attorney.  
14

15 84. Defendant NYPD Detective Terrance Hayes had to be replaced by another male NYPD  
16 detective since he was using physical violence by slamming the Plaintiff Julia Sorokin's hands on the  
17 finger printing equipment when she would not answer his questions during his secret interrogation with  
18 no attorney present in his office.

19 85. Defendant NYPD Detective Terrance Hayes did not take the Plaintiff Julia Sorokin to the  
20 Judge for arraignment that day to hear her charges or speak to her attorney since he needed to force a  
21 confession out of the Plaintiff Julia Sorokin. Defendant NYPD Detective Terrance Hayes could have  
22 taken the Plaintiff Julia Sorokin to night court arraignment in that same building.  
23

24 86. Defendant NYPD Detective Terrance Hayes then returned the Plaintiff Julia Sorokin back to  
25 Rikers Island Correctional Facility without her seeing the Judge or her attorney. The Plaintiff Julia  
26 Sorokin still had not been provided winter clothing or food.  
27  
28

1           87. Defendant NYPD Detective Terrance Hayes kept the Plaintiff Julia Sorokin in a holding  
2 cage and did not allow her to attend prisoner meals in central booking with other prisoners.

3           88. Unknown to Defendant NYPD Detective Terrance Hayes, the Plaintiff Louis A. Bravo now  
4 in New York City has located his wife and waited over eight hours at the Rikers Island Correctional  
5 facility doorway in freezing temperatures in order to provide a change of clothing, shoes and coat for  
6 the Plaintiff Julia Sorokin's second trip back to court after her second night at of Rikers Island  
7 Correctional Facility.  
8

9           89. Plaintiff Julia Sorokin spent a second night at Rikers Island Correctional Facility without  
10 knowing her charges or speaking to her attorney. The next day, Plaintiff Julia Sorokin is returned to  
11 court for her arraignment, before she is taken to the arraignment Judge, the sealed governor's warrant is  
12 unsealed in private listing the false charges of Grand Larceny, Forgery, and Aggravated Personal  
13 Identity Theft.  
14

15           90. Before Plaintiff Julia Sorokin is taken to court, the Grand Larceny and Forgery charges are  
16 quietly dropped by the Defendants at the District Attorney's Office without any explanation. Plaintiff's  
17 Julia Sorokin attorney was not told of the dropped charges or that they existed in the first place.

18           91. The Defendants at the District Attorney's Office kept the false Aggravated Personal Identity  
19 Theft charges on the indictment which is a violation to both federal and New York State law due to the  
20 fact that Aggravated Personal Identity Theft is not a standalone felony charge.  
21

22           92. Plaintiff Julia Sorokin then went before the arraignment Judge Bruce Allen and was not  
23 allowed to speak to her attorney before arraignment. This is the first time Plaintiff Julia Sorokin saw  
24 her attorney after close to three weeks of prison of not knowing her charges or being read her rights.

25           93. The Defendants at the District Attorney's Office added on the fabricated Grand Larceny and  
26 Forgery charges to deceive the Grand Jury into giving a felony indictment, and then the Defendants at  
27  
28

1 the District Attorney's Office removed the false charges before it could be listed into court records and  
2 made public.

3 94. This action of fabricating these false felony charges made an original civil business dispute  
4 that Plaintiff Julia Sorokin had with the Dow Jones into a false felony indictment by fabricating charges  
5 that did not exist and were not committed by the Plaintiff Julia Sorokin.  
6

7 95. In an effort to avoid a civil lawsuit in San Diego, California, The Dow Jones and Co. Inc.  
8 used the Defendants at the New York County District Attorney's Office with the assistance of attorney  
9 Martin Schwimmer to frame and prosecute the Plaintiff Julia Sorokin in New York City.

10 96. Defendant Assistant District Attorney Joanne Siegmund then told the arraignment court that  
11 the Plaintiff Julia Sorokin is being charged with four counts of Personal Identity Theft in an aggravated  
12 level, but she did not specify the names of the victims of personal identity theft, and did not specify  
13 their residence in New York City.  
14

15 97. Defendant Assistant District Attorney Joanne Siegmund then presented a newly created  
16 indictment no: 5257-08 without the Grand Larceny and Forgery charges with no victims, evidence,  
17 crime location, or when the crime occurred.

18 98. Indictment no: 5257-08 does not justify the request or enforcement of a sealed governor's  
19 warrant due to the fact that the charge of Aggravated Personal Identity Theft without any other felonies  
20 is not a felony charge in New York State.  
21

- 22 • A copy of indictment no: 5257-08 is attached to this complaint as Exhibit B.

23 99. Defendant Assistant District Attorney Joanne Siegmund then asked the court to give a  
24 unreasonable bail of \$250,000 to the Plaintiff Julia Sorokin, who has no prior criminal record, is a non-  
25 offender, and is not a resident of New York State and has an indictment without victims of a crime in  
26 New York State.  
27  
28

1           100. During arraignment of the Plaintiff Julia Sorokin, the Defendant Assistant District  
2 Attorney Joanne Siegmund slandered both of the Plaintiffs Julia Sorokin and her husband Louis A.  
3 Bravo with lies and distorted private information obtained without a search warrant from the Plaintiffs'  
4 home at 101 Market Street San Diego, California by the Detective Julio Sandoval and Carlos Vasquez.  
5 The arraignment Judge granted a \$50,000 bail and told the Plaintiff Julia Sorokin to remain in New  
6 York State for court proceedings.  
7

8  
9           **New York City Department of Corrections Misconduct and Civil Rights Violations**

10           101. After arraignment, Plaintiff Julia Sorokin is once again returned to Rikers Island  
11 Correctional Facility until the unreasonable bail is posted for her release. At this point, Plaintiff Julia  
12 Sorokin has not had a bed or a shower for over two and a half days.  
13

14           102. At Rikers Island Correctional Facility Plaintiff Julia Sorokin is given forced medical  
15 injections without explanation of what is being given to her. Plaintiff Julia Sorokin is then forced to  
16 carry her issued inmate items and her winter clothing that her husband provided in a box to her cell in  
17 her condition.

18           103. That night the Plaintiff Julia Sorokin suffered a miscarriage while waiting for a bed,  
19 shower, food, and water that was not provided. The Plaintiff Julia Sorokin was never given medical  
20 care or allowed to see a doctor during her detention at Rikers Island Correctional Facility.  
21

22           104. The Plaintiff Julia Sorokin was then issued an inmate ID that identified her as Jewish  
23 subjecting the Plaintiff Julia Sorokin to religious persecution, and abuse by fellow inmates and  
24 corrections officers at Rikers Island Correctional Facility.

25           105. The Plaintiff Julia Sorokin was then forced by the Corrections Officer on duty to provide  
26 care for herself and drink hot tap water for hydration the only water available her in the cell.  
27  
28

1           106. The Plaintiff Julia Sorokin was kept a total of one week at Rikers Island Correctional  
2 Facility while the Defendant Assistant District Attorney Joanne Siegmund delayed the release of the  
3 Plaintiff Julia Sorokin by not faxing the appropriate forms needed for Julia Sorokin's release.

4           107. Plaintiff Louis A. Bravo had to wait over 30 hours of freezing temperatures outside of  
5 Rikers Island Correctional Facility to recover his wife Plaintiff Julia Sorokin due to the Defendant  
6 Joanne Siegmund's delay of paperwork. Plaintiff Louis A. Bravo was subjected to several hours of  
7 threats of arrest and harassment by New York City Department of Corrections Officers during this time  
8 frame. Plaintiff Julia Sorokin was released at midnight, on December 24<sup>th</sup>, 2008.

9           108. After Plaintiff Julia Sorokin endured three weeks in prison a kidnapping and a miscarriage,  
10 both Plaintiffs found themselves homeless in the winter in New York City, 3,000 miles from their home  
11 in San Diego, California due to the excessive bail restrictions of remaining in the state of New York  
12 imposed by both the Defendant Assistant District Attorney Joanne Siegmund and the arraignment  
13 Judge Bruce Allen.  
14  
15

16  
17           **Violation of Due Process during the criminal court proceedings in New York City, NY**

18           109. During Pre-Trial Discovery, Plaintiff Julia Sorokin's defense attorney was denied every  
19 request for discovery denying the Plaintiff Julia Sorokin her Due Process rights. Defendant Assistant  
20 District Attorney Joanne Siegmund did not release the Plaintiff Julia Sorokin's personal belongings or  
21 her identification that was needed to seek medical care in New York City.  
22

23           110. Defendant Assistant District Attorney Joanne Siegmund did not return the Plaintiff Julia  
24 Sorokin's bible that was taken by Defendant NYPD Detective Terrance Hayes in San Diego before the  
25 extradition to New York.  
26  
27  
28

1 111. The presiding Judge Ronald A. Zweibel granted a review, not a release of the Grand Jury  
2 minutes in order to answer jurisdictional challenges by the Plaintiffs. The Defendant Assistant District  
3 Attorney Joan Siegmund once again delayed the court process several weeks by not submitting the  
4 Grand Jury Minutes to the court.

5 112. After reviewing the Grand Jury minutes, the presiding Judge Ronald A. Zweibel informed  
6 the defense attorney representing the Plaintiff Julia Sorokin that he will be dismissing the indictment  
7 since the District Attorney's Office did not present any victims in New York who suffered aggravated  
8 personal identity theft.

9 113. Defendant Assistant District Attorney Joanne Siegmund then came in to court to threaten  
10 the presiding Judge Ronald A. Zweibel not to dismiss the indictment. She told the Judge that the  
11 Plaintiff Julia Sorokin solicited advertising in California. In response to her unfounded accusations, the  
12 Judge told her that selling advertising in California is not a crime in New York and that this is not  
13 Aggravated Personal Identity Theft.  
14  
15

16  
17 **The cover up of false charges with no jurisdiction by Judge Ronald A. Zweibel**

18 114. One week later, the presiding Judge Ronald A. Zweibel told the court that there will be no  
19 disposition on this case and did not state the pre-trial decision for court records. This act of judicial  
20 misconduct and violation of Due Process is recorded in court minutes. The Judge was supposed to  
21 explain his decision on the court record, which he failed to do.  
22

23 115. The Plaintiff Julia Sorokin was never given her pretrial decision or a reason why the case  
24 was not dismissed for lack of jurisdiction and lack of victims.

25 116. A few days later both Plaintiffs got a copy of the missing pretrial decision. The decision  
26 stated that under NYS CPL 20.40, newspapers are persons in New York State and they reside in New  
27  
28

1 York for jurisdictional purposes, and similar website urls and emails, which the Plaintiff Julia Sorokin  
2 purchased and legally owned, is considered Aggravated Personal Identity Theft under NYS Penal Code  
3 190.80 and 190.79.

4 117. The Judge Ronald A. Zweibel then closed out the pretrial decision by stating that the  
5 disclosure of the Grand Jury Minutes is not necessary and that no other motions will be granted before  
6 trial.  
7

- 8 • A copy of this pretrial decision is attached as Exhibit C

9 118. The Judge Ronald A. Zweibel did not set dates for pre-trial hearings, where the Plaintiff  
10 Julia Sorokin could face her accusers. The Judge Ronald A. Zweibel did not announce the dates for the  
11 pre-trial hearings, leaving both Plaintiffs with no closure on the seven months of malicious prosecution  
12 and kidnapping of the Plaintiff Julia Sorokin by the Defendants at the New York County District  
13 Attorney's Office and Defendant NYPD Detective Terrance Hayes.  
14

15 119. After speaking with the Defendants at the District Attorney's office in the court room, the  
16 Plaintiff Julia Sorokin's defense attorney told both Plaintiffs that big money is involved in this case and  
17 that the District Attorney, specifically the Defendant Robert Morgenthau will stop at nothing to put the  
18 Plaintiff Julia Sorokin in prison without jurisdiction or existing victims of a crime.

19 120. The Defendants at the District Attorney's Office of New York County charged the Plaintiff  
20 Julia Sorokin with Aggravated Personal Identity Theft of newspapers since they did not have any  
21 victims of a crime and needed to close out the indictment with a conviction. The Defendants at the  
22 District Attorney's Office of New York County originally stated on the police report that the total  
23 number of victims was zero so they had to create a victim even if it wasn't human, which led them to  
24 state on the pre-trial decision that newspapers are people and victims of Personal Identity Theft for the  
25 sake of jurisdiction.  
26  
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1 121. When the Defendants at the District Attorney's Office of New York County failed to find a  
2 crime in New York State for which they can indict the Plaintiff Julia Sorokin, they fabricated the false  
3 charges of Grand Larceny and Forgery as well as Aggravated Personal Identity Theft.

4 122. These charges were used by the Defendants at the District Attorney's Office of New York  
5 County to mislead the Grand Jury into believing that Plaintiff Julia Sorokin's legal advertising business  
6 in California was a major criminal enterprise operating in New York.

7 123. These false charges also mislead the Grand Jury into believing that the Plaintiff Julia  
8 Sorokin stole the personal identification of the employees at the newspapers. The Defendants at the  
9 District Attorney's Office of New York conducted this false arrest to frame the Plaintiff Julia Sorokin,  
10 by having attorney Martin Schwimmer stand in for the Wall Street Journal as the attorney representing  
11 the victims of Aggravated Personal Identity Theft.  
12

13 124. Without knowing what happened to the case, both Plaintiffs returned to San Diego,  
14 California after being homeless in New York State for seven months only to find out that the court had  
15 revoked the bail by using the tactic of not setting future court dates for the Plaintiff Julia Sorokin. This  
16 action was designed to have the Plaintiff Julia Sorokin miss a court date so she can be returned to  
17 prison for the remaining malicious prosecution under color of law.  
18

19 125. Both Plaintiffs had also been evicted from their home after the property management  
20 company was falsely told of illegal activities being conducted in the Plaintiffs home by the same San  
21 Diego Detectives Julio Sandoval and Carlos Vasquez who kidnapped the Plaintiff Julia Sorokin on the  
22 request of Defendant NYPD Detective Terrance Hayes.  
23

24 126. This was sufficient grounds to terminate the lease that was in good standing due to false  
25 accusations by both Detectives Julio Sandoval and Carlos Vasquez who did not even know the charges,  
26 due to the sealed governor's warrant.  
27  
28

1           127. Both Detectives Julio Sandoval and Carlos Vasquez then recovered private information  
2 without a warrant from the Plaintiff's home as well as documents from the property management  
3 company, turning them over to the Defendant NYPD Detective Terrance Hayes.

4           128. Both Plaintiffs lost everything they owned including furniture, business equipment,  
5 personal files, clothing, family photos, their wedding bands-everything was thrown out by the  
6 apartment clean up team after the eviction.

7  
8           129. By losing their business equipment and business files, both Plaintiffs lost all means of  
9 generating income due to the apartment clean up done after the eviction.

10           130. The court records in San Diego will show a record of the eviction of both Plaintiffs from  
11 their home. The apartment was already rented to another tenant upon Plaintiffs return to San Diego,  
12 adding more humiliation and pain to all factual events listed in this complaint.

13  
14           131. The Plaintiffs were left no other choice but to seek a federal injunction and damages in this  
15 court and in this jurisdiction. The Defendants at the District Attorney's Office of New York County  
16 under color of law revoked the Plaintiff Julia Sorokin's bail once they were faced with the reality that  
17 they were going to be held accountable in a federal court for violations against the constitutional rights  
18 of both Plaintiffs.

19           132. By not knowing future pre-trial hearing court dates, the Plaintiff Julia Sorokin would  
20 certainly miss the next announced court date and that would return her to jail. The Defendants at the  
21 District Attorney's Office of New York County had a plan to sentence Plaintiff Julia Sorokin and put  
22 her in prison even though no crimes were committed, and no victims were hurt, so that Plaintiff Julia  
23 Sorokin would be unable to seek the assistance of a federal court and prove her innocence.

24  
25 ///

26 ///

**Conspiracy and conflict of interest conducted by Defendant Robert Morgenthau**

133. Defendant Robert Morgenthau, former head of the District Attorney's Office of New York County was acting in conspiracy and conflict of interest by starting a malicious investigation and malicious prosecution of an innocent California resident Plaintiff Julia Sorokin.

134. The Defendant Robert Morgenthau, former head of the District Attorney's Office of New York County conducted this malicious investigation and malicious prosecution upon the request of the Wall Street Journal, where Defendant Robert Morgenthau was a frequent writer.

135. After 35 years of public service, the former District Attorney Defendant Robert Morgenthau retired shortly after the bail of the Plaintiff Julia Sorokin was revoked, and took a position with Wachtell, Lipton, Rosen & Katz, a law firm that provides legal counsel to the Bancroft family, who are the original owners of the Dow Jones & Company and the Wall Street Journal.

136. Defendant Robert Morgenthau began his employment at this law firm just ten days after leaving the District Attorney's Office of New York County and overseeing the malicious prosecution of the Plaintiff Julia Sorokin.

137. Defendant Robert Morgenthau's long-time personal assistant Ida Van Lindt, has also has been given a lucrative job at Wachtell, Lipton, Rosen & Katz.

1. This is a link to the web page of Wachtell, Lipton, Rosen & Katz listing the Bancroft Family as a client in the News Corp.'s \$5.6 billion acquisition of Dow Jones & Co.

<http://www.wlrk.com/Page.cfm/Thread/Practice>

- A copy of this web page is also attached as Exhibit D.

2. Defendant Robert Morgenthau's new position at Wachtell, Lipton, Rosen & Katz:

ROBERT M. MORGENTHAU (Of Counsel, LITIGATION)

(tel.) 212.403.1223 (fax) 212.403.2223 RMMorgenthau@wlrk.com

**Argument for Injunction before Trial**

138. In determining whether to grant injunctive relief before trial, the court must consider the following action done under color of law by the Defendants:

1. The Defendants at the District Attorney's Office of New York County defied a U.S. Supreme Court ruling on Aggravated Identity Theft that occurred in 2009 during the discovery process of the criminal court proceedings IGNACIO CARLOS FLORES-FIGUEROA v. UNITED STATES. The court stated that prosecutors filing Aggravated Identity Theft charges must first prove that the defendant was knowingly in the possession of another person's identification.

The Defendants at the District Attorney's Office of New York have not done this.

2. The Defendants at the District Attorney's Office of New York County conspired under color of law by deceiving other law enforcement agencies in order to conduct a kidnapping / extradition of an innocent California resident by using a fraudulently obtained sealed governor's extradition warrant.

3. The Defendants at the District Attorney's Office of New York County are representing the Dow Jones and Co. and the Wall Street Journal that are not victims of a crime.

4. Newspapers are products of publishing corporations, that can't be a victim of Aggravated Personal Identity Theft, and can't be a person who resides in New York for the sake of jurisdiction.

5. The Defendants at the District Attorney's Office of New York County have excessively delayed the trial for their own advantage violating the Sixth Amendment right of the Plaintiff Julia Sorokin. The court process has been delayed seven months, since the Defendants at the District Attorney's Office of New York County refused to release any of the particulars that Plaintiff Julia Sorokin requested in pre-trial discovery motions. In Strunk v. United States, 412

1 U.S. 434 (1973), the Supreme Court ruled that if the reviewing court finds that a defendant's  
2 right to a speedy trial was violated, then the indictment must be dismissed and/or the conviction  
3 overturned.

4 6. The Defendants at the District Attorney's Office of New York County conspired under color  
5 of law and conspiracy by presenting fabricated evidence to the Grand Jury in order to secure a  
6 felony indictment, by presenting distorted versions of NYS Penal Code 190.80 and 190.79 to  
7 the Grand Jury, in order to secure the false charge of Personal Identity Theft in an Aggravated  
8 capacity, as well as fabricating other false felony charges of Grand Larceny and Forgery.

9 7. The Defendants at the District Attorney's Office of New York County have never presented  
10 any people living or deceased in New York State who are victims of Aggravated Personal  
11 Identity Theft, thus denying the Plaintiff the right to face her accusers. This action by the  
12 Defendants at the District Attorney's Office of New York County violated the Plaintiff Julia  
13 Sorokin's Six Amendment right to confront her accusers in pre-trial.

14 8. The Defendants at the District Attorney's Office of New York County have never presented  
15 any pieces of personal identifying information stolen by the Plaintiff Julia Sorokin in New York  
16 State.

17 9. The Defendants at the District Attorney's Office of New York County presented a false  
18 police report and false criminal indictment to the Attorney General's Office of New York in  
19 order to obtain a governors warrant.

20 10. The Defendants at the District Attorney's Office of New York County and the Defendant  
21 NYPD Detective Terrance Hayes prevented the Plaintiff Julia Sorokin from speaking to the  
22 Grand Jury by using malicious tactics under color of law.

1 11. The Defendants at the District Attorney's Office of New York County and the Defendant  
2 NYPD Detective Terrance Hayes filed a false police report with no victims of Aggravated  
3 Personal Identity Theft or crime location in New York State.

4 12. The Defendants at the District Attorney's Office of New York County have never presented  
5 how or where the Plaintiff Julia Sorokin committed the theft of another person's Personal  
6 Identity.

7 13. The Defendants at the District Attorney's Office of New York County have no legal  
8 jurisdiction in San Diego, California, where they kidnapped the Plaintiff Julia Sorokin under  
9 color of law with the assistance of the San Diego County Sheriff's Department.

10 14. The Defendants at the District Attorney's Office of New York County acted under color of  
11 law by sealing the governor's extradition warrant so that the Plaintiff Julia Sorokin could not  
12 know or challenge her charges from San Diego, California.

13 15. The Defendants at the District Attorney's Office of New York County conspired under color  
14 of law by keeping the Plaintiff Julia Sorokin in prison for three weeks in two states denying her  
15 rights as secured under the U. S. constitution.

16  
17  
18  
19 **Plaintiffs' Pain, Suffering and Damages**

20 139. Plaintiff Julia Sorokin's pain, suffering and damages:

- 21 1. Illegal kidnapping and false arrest, and false imprisonment, a violation of constitutional  
22 rights.  
23 2. Cruel and unusual punishment, a violation of constitutional rights.  
24 3. Suffered a miscarriage in prison with no medical care.  
25 4. Denied Due Process rights, a violation of constitutional rights.  
26  
27  
28

1 5. Search of her home without a search warrant, a violation of constitutional rights.

2 6. Being forced into homelessness in New York for six months.

3 7. Unreasonably high bail \$50,000 USD, a violation of constitutional rights.

4 8. Never being read Miranda rights, a violation of constitutional rights.

5 9. Subjected to religious persecution, a violation of constitutional rights.

6 10. Loss of all personal and business belongings due to eviction of home.

7 11. Loss of income, reputation, and business or employment opportunities.

8 140. The Plaintiff Julia Sorokin is now attempting to make a life for herself after surviving  
9 several days and weeks of both prison and police abuse, prosecutor misconduct and malicious  
10 prosecution. Additionally, the loss of her home and reputation also impacted any future potential of not  
11 only being able to restore her personal life and business career, but also gaining future employment.  
12

13 141. The health damages that the Plaintiff Julia Sorokin has to now live with are:

14 1. Suffers from constant fear of arrest.

15 2. Suffers from constant claustrophobia.

16 3. Suffers from sleeping and eating disorders.

17 4. Suffers from loss of concentration.

18 5. Suffers from constant depression.

19 6. Suffers from fear of being left alone.

20 7. Suffers from constant nightmares.

21 8. Suffers from constant anxiety / panic attacks.

22 142. Plaintiff Louis A. Bravo's pain, suffering and damages:

23 1. Search of his home without a search warrant, a violation of constitutional rights.

24 2. Being forced into homelessness in New York State for six months.

1 3. Loss of all personal belongings due to eviction of home.

2 4. Loss of Med-Accommodations, a company that provided medical personnel relocation  
3 services across North America. This company had an average yearly revenue of \$122,286 USD  
4 and a market value of over 5 million USD. Plaintiff Louis Bravo lost this business due to  
5 eviction of home and removal of business equipment and software.

6 5. Loss of Clinical Trials Over Watch, a company that provided biotech and pharmaceutical  
7 companies with a project management drug development solution. This company had an  
8 average yearly revenue of \$234,114 USD and a market value of over 10 million USD. Plaintiff  
9 Louis Bravo lost this business due to eviction of home and removal of business equipment and  
10 software.

11 6. Emotional and economic pain of having to care for his wife after false arrest.

12 7. Emotional pain of having lost his unborn child, due to wife's false arrest and unlawful  
13 imprisonment in both San Diego County and New York City.

14 8. Suffers from the enormous financial legal cost due to the false arrest.

15 143. All damages to both Plaintiffs are a direct result of all the Defendants acting individually  
16 or jointly and in conspiracy, and out of the scope of their employment as well as acting under color of  
17 law in the violations of constitutional rights as secured by the U.S. Constitution to both Plaintiffs Julia  
18 Sorokin and her husband Plaintiff Louis Bravo.

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**CAUSES OF ACTION**

**COUNT 1**

**42 U.S.C § 1983 – PROSECUTOR MISCONDUCT**

**(Defiance of a 2009 U.S. Supreme Court Ruling on Aggravated Identity Theft)**

144. Plaintiffs repeat 1-143 of this Complaint as if restated fully here.

145. The Defendants:

1. The New York County District Attorney's Office

2. Former New York County District Attorney Robert Morgenthau

3. District Attorney Cyrus Vance Jr.

4. Assistant District Attorney Joanne Siegmund

are in clear defiance and violation of a 2009 U.S. Supreme Court ruling *IGNACIO CARLOS FLORES-FIGUEROA v. UNITED STATES* that states: prosecutors who file identity-theft charges must prove the defendant knew that the information used belonged to 'another person'.

146. The Defendants have never demonstrated how the Plaintiff Julia Sorokin knew the information used belonged to 'another person'.

147. As a result of the Defendants defying a 2009 U.S. Supreme Court Ruling, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

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**COUNT 2**

**42 U.S.C § 1983 – PROSECUTOR MISCONDUCT**

**(Obtaining and enforcing a governor's extradition warrant under color of law)**

148. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

149. The Defendants:

1. The District Attorney's Office of New York County
2. The Attorney General's Office of New York State
3. Former New York County District Attorney Robert Morgenthau
4. Assistant District Attorney Joanne Siegmund

violated Plaintiffs Julia Sorokin's rights by obtaining a governor's extradition warrant under color of law.

150. The Defendants at the District Attorney's Office of New York County used fabricated evidence and presented distorted versions of NYS Penal Code 190.80 and 190.79 to the Grand Jury, as well as added other false felony charges that were dropped before arraignment in order to secure a felony indictment for a false charge of Aggravated Identity Theft.

151. Defendant the Attorney General's Office of the State of New York then issued the governor's extradition warrant upon request from the District Attorney's Office of New York County for the Plaintiff Julia Sorokin without verifying whether the Plaintiff Julia Sorokin was actually a fugitive from New York State or if the request for the warrant was legally sufficient or valid to authorize an extradition.

152. As a result of the obtainment and enforcement of the governor's extradition warrant by the Defendants, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

**COUNT 3**

**42 U.S.C § 1983 – PROSECUTOR MISCONDUCT**

**(Sealing of the governor's extradition warrant under color of law)**

153. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

154. The Defendants:

1. The District Attorney's Office of New York County

2. Former New York County District Attorney Robert Morgenthau

3. Assistant District Attorney Joanne Siegmund

violated Plaintiff Julia Sorokin's rights by sealing the governor's extradition warrant.

155. The Defendants at the District Attorney's Office of New York County sealed the governor's extradition warrant in order to conceal the false charges so that the Plaintiff Julia Sorokin, a California resident could not challenge her extradition to New York City, New York.

156. The Defendants at the District Attorney's Office of New York County sealed the governor's extradition warrant in order to conceal the fact that the indictment stated no crime or victims.

157. The Defendant at the District Attorney's Office of New York County sealed the governor's extradition warrant in order to deceive other law enforcement agencies into providing assistance in the kidnapping of Plaintiff Julia Sorokin from her home in 101 Market Street San Diego, CA.

158. As a result of sealing the governor's extradition warrant by the Defendants, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

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**COUNT 4**

**42 U.S.C § 1983 – PROSECUTOR MISCONDUCT**

**(Filing false charges of aggravated personal identity theft)**

159. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

160. The Defendants:

1. The New York County District Attorney's Office
2. Former New York County District Attorney Robert Morgenthau
3. Assistant District Attorney Joanne Siegmund

have listed emails and website urls belonging to the Plaintiff Julia Sorokin as means of "identification of another person" who resides in New York.

161. The Defendants are in clear violation of both NYS Penal 190.80 and 190.79 due to the fact that emails and website urls are not "means of personal identification information of another person"

162. As a result of the Defendants use and enforcement of filing false charges, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

**COUNT 5**

**42 U.S.C § 1983 – PROSECUTOR MISCONDUCT**

**(Fabricating false felony charges in order to obtain a Grand Jury indictment)**

163. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

164. The Defendants:

1. The New York County District Attorney's Office
2. Former New York County District Attorney Robert Morgenthau

166. As a result of the Defendants fabricating false felony charges, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

## 42 U.S.C § 1983 – PROSECUTOR MISCONDUCT

167. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

## 1. The New York County District Attorney's Office

**2. Former New York County District Attorney Robert Morgenthau**

### 3. Assistant District Attorney Joanne Siegmund

#### 4. The New York City Police Department

## 5. NYPD Detective Terrance Hayes

have never demonstrated how the Plaintiff Julia Sorokin owned her business website urls and emails without lawful authority. This shows that the Grand Jury indictment obtained by the Defendants was gotten under color of law using fabricated false felony charges in order to obtain jurisdiction over the Plaintiff Julia Sorokin a San Diego, California resident.

1 169. As a result of the Defendants fabricating false felony charges in order to obtain  
2 jurisdiction, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as  
3 is more fully alleged above in 1-143 of this complaint.  
4

5  
6 **COUNT 7**

7 **42 U.S.C § 1983 - DEPRIVATION OF RIGHTS UNDER COLOR OF LAW**

8 **(Three week unlawful prison detention in two states without stating charges)**

9 170. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

10 171. The Defendants:

- 11 1. The New York County District Attorney's Office  
12 2. Former New York County District Attorney Robert Morgenthau  
13 3. Assistant District Attorney Joanne Siegmund  
14 4. The New York City Police Department  
15 5. NYPD Detective Terrance Hayes  
16

17 deprived the rights of Plaintiff Julia Sorokin under color of law by keeping her in prison in two  
18 different states for over a period of three weeks without any contact with her attorney or informing the  
19 Plaintiff Julia Sorokin what her charges were at any point during the three weeks in prison.  
20

21 172. As a result of this unlawful prison detention conducted by the Defendants, the Plaintiff  
22 Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged  
23 above in 1-143 of this complaint.

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25 ///

26 ///

**COUNT 8**

**42 U.S.C § 1983 – CONSPIRACY AGAINST RIGHTS UNDER COLOR OF LAW**

**(Defendants conspired to injure, oppress, threaten, and intimidate Plaintiff Julia Sorokin)**

173. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

174. The Defendants:

1. The New York County District Attorney's Office
2. Former New York County District Attorney Robert Morgenthau
3. Assistant District Attorney Joanne Siegmund
4. The New York City Police Department
5. NYPD Detective Terrance Hayes
6. The New York Attorney General's Office

under color of law violated Plaintiff Julia Sorokin's rights by working in groups of two or more in conspiring to injure, oppress, threaten, and intimidate Plaintiff Julia Sorokin, a California resident, who did not commit any crimes New York State. This act prevented and hindered her free exercise or enjoyment of her rights protected under the U.S. constitution.

175. As a result of the Defendants conspiring against Plaintiff Julia Sorokin's rights, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

**COUNT 9**

**42 U.S.C § 1983 - VIOLATION OF EIGHTH AMENDMENT RIGHTS**

**(Setting an unreasonable bail of \$50,000 USD)**

176. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

1 177. The Defendants:

2 1. The New York County District Attorney's Office

3 2. Former New York County District Attorney Robert Morgenthau

4 3. Assistant District Attorney Joanne Siegmund

5 violated the Eighth Amendment rights of Plaintiff Julia Sorokin by setting an unreasonable bail which  
6 started at \$250,000 United States Dollars. The bail was eventually reduced to \$50,000 United States  
7 Dollars violating the Plaintiff Julia Sorokin's Eighth Amendment protection from being subjected to an  
8 unreasonable bail.  
9

10 178. The Defendants had no legal basis to ask for \$250,000 bail for the Plaintiff Julia Sorokin  
11 who has no prior criminal record, did not pose a threat to society, did not reside in New York, and did  
12 not commit a crime in New York.

13 179. This tactic was used by the Defendants to ensure that the Plaintiff Julia Sorokin would not  
14 be able to post bail, which in turn would allow the Defendants to continue the unlawful detention and  
15 imprisonment of Plaintiff Julia Sorokin under color of law.  
16

17 180. As a result of this act and violation of the Eighth Amendment rights by the Defendants, the  
18 Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully  
19 alleged above in 1-143 of this complaint.  
20

21  
22 **COUNT 10**

23 **42 U.S.C § 1983 - VIOLATION OF EIGHTH AMENDMENT RIGHTS**

24 **(Subjecting the Plaintiff Julia Sorokin to extreme temperatures during her extradition)**

25 181. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

26 182. The Defendants:  
27  
28

1. The New York County District Attorney's Office
2. Former New York County District Attorney Robert Morgenthau
3. Assistant District Attorney Joanne Siegmund
4. The New York City Police Department
5. NYPD Detective Terrance Hayes

violated the Eighth Amendment rights of Plaintiff Julia Sorokin by not providing her with proper clothing during the extradition process in two states where temperatures during the time of the extradition ranged from 92° degrees in San Diego, California where the Plaintiff was forced to wear a man's sweater and chains and 18° degrees New York City, New York where the Plaintiff Julia Sorokin was forced to stand in freezing cold temperatures wearing no winter clothing or shoes while the Defendant NYPD Detective Terrance Hayes cleaned his personal car. This is a clear violation of the Plaintiff Julia Sorokin's Eighth Amendment rights from being subject to cruel and unusual punishment.

183. As a result of this act and violation of the Eighth Amendment by the Defendants, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

#### **COUNT 11**

#### **42 U.S.C § 1983 - VIOLATION OF EIGHTH AMENDMENT RIGHTS**

#### **(Failure to provide medical care during unlawful prison detention)**

184. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

185. The Defendants:

1. The New York County District Attorney's Office
2. Former New York County District Attorney Robert Morgenthau

1 3. Assistant District Attorney Joanne Siegmund

2 4. The New York City Police Department

3 5. NYPD Detective Terrance Hayes

4 6. The New York City Department of Corrections

5 violated the Eighth Amendment rights of Plaintiff Julia Sorokin by not providing her any access to  
6 medical care during her prison detention in Rikers Island Correctional Facilities in Queens New York.  
7 The Plaintiff was never given any medical care during or after her miscarriage at Rikers Island  
8 Correctional Facilities in Queens New York.  
9

10 186. This demonstrates a clear violation done by the Defendants against Plaintiff Julia Sorokin's  
11 Eighth Amendment rights from being subjected to cruel and unusual punishment.

12 187. As a result of this act and violation of the Eighth Amendment by the Defendants, the  
13 Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully  
14 alleged above in 1-143 of this complaint.  
15

16  
17 **COUNT 12**

18 **42 U.S.C § 1983 - VIOLATION OF FIRST AMENDMENT RIGHTS**

19 **(Subjecting the Plaintiff Julia Sorokin to religious persecution)**

20 188. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

21 189. The Defendants:

22 1. The New York County District Attorney's Office

23 2. Former New York County District Attorney Robert Morgenthau

24 3. Assistant District Attorney Joanne Siegmund

25 4. The New York City Police Department  
26  
27  
28

1 5. NYPD Detective Terrance Hayes

2 6. The New York City Department of Corrections

3 violated the First Amendment rights of Plaintiff Julia Sorokin by:

4 1. Seizing her bible and keeping it from her since the date of the false arrest.

5 2. Labeling the Plaintiff Julia Sorokin as Jewish on her New York Prison ID tag subjecting her  
6 to abuse by correction officers and inmates at Rikers Island Detention Facility for over one  
7 week.  
8

9 3. Not allowing her to attend any religious services and counseling during her three weeks in  
10 prison in two states.

11 190. As a result of this act and violation of the Plaintiff Julia Sorokin's First Amendment rights  
12 by the Defendants, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic  
13 suffering, as is more fully alleged above in 1-143 of this complaint.  
14

15  
16 **COUNT 13**

17 **42 U.S.C § 1983 - VIOLATION OF FOURTH AMENDMENT RIGHTS**

18 **(Illegal search and seizure conducted without warrants)**

19 191. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

20 192. The Defendants:

21 1. The New York County District Attorney's Office

22 2. Former New York County District Attorney Robert Morgenthau

23 3. Assistant District Attorney Joanne Siegmund

24 4. The New York City Police Department

25 5. NYPD Detective Terrance Hayes  
26  
27  
28

1 violated the Fourth amendment by illegally searching:

2 1. Plaintiff Julia Sorokin's bank accounts without a search warrant.

3 2. Plaintiff Julia Sorokin's data hosting accounts without a search warrant.

4 3. Plaintiffs Julia Sorokin's and Louis A Bravo's home at 101 Market Street, San Diego  
5 California without a search warrant.

6  
7 193. As a result of this act and violation of the Fourth Amendment by the Defendants, the  
8 Plaintiffs Julia Sorokin and Louis A. Bravo were subjected to emotional, physical and economic  
9 suffering, as is more fully alleged above in 1-143 of this complaint.

10  
11 **COUNT 14**

12 **42 U.S.C § 1983 - VIOLATION OF JURISDICTIONAL AUTHORITY AND POWERS**

13 **(Kidnapping of a California resident under color of law)**

14  
15 194. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

16 195. The Defendants:

17 1. The New York County District Attorney's Office

18 2. Former New York County District Attorney Robert Morgenthau

19 3. Assistant District Attorney Joanne Siegmund

20 4. The Attorney General's Office of New York State

21 5. The New York City Police Department

22 6. NYPD Detective Terrance Hayes

23  
24 violated their jurisdictional authority and powers by kidnapping Plaintiff Julia Sorokin outside of her  
25 home at 101 Market Street in San Diego, California while acting under color of law. The Defendants  
26 only have Jurisdictional Authority and Powers in New York City, New York.

1 196. As a result of this act and violation of jurisdictional authority and power by the  
2 Defendants, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as  
3 is more fully alleged above in 1-143 of this complaint.

4 **COUNT 15**

5 **42 U.S.C § 1983 - FAILURE TO INTERVENE**

6 **(District Attorney Defendant Cyrus Vance failure to intervene)**

7 197. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

8 198. The Defendant District Attorney of New York County Cyrus Vance Jr. has failed to  
9 address the malicious investigation, the malicious prosecution, prosecutor misconduct and civil rights  
10 violations done by the Defendants listed above against the Plaintiff Julia Sorokin.

11 199. The Defendant District Attorney of New York County Cyrus Vance Jr. was informed of  
12 the malicious investigation, malicious prosecution, prosecutor misconduct and civil rights violations  
13 and details of the kidnapping and unlawful imprisonment of the Plaintiff Julia Sorokin on March 1st  
14 2010. This information came in the form of a cease of a desist letter by the Plaintiff Louis A. Bravo.  
15 The Defendant District Attorney of New York County Cyrus Vance Jr. has taken no action to stop,  
16 prosecute, or discipline any of the Defendants listed in this complaint.

17 200. The Defendant District Attorney of New York County Cyrus Vance Jr. has also continued  
18 the prosecution of Plaintiff Julia Sorokin initiated by his predecessor Robert Morgenthau by utilizing  
19 the very members of his staff who were responsible for the malicious investigation, malicious  
20 prosecution, prosecutor misconduct and civil rights violations.

21 201. As a result of the failure to intervene by the Defendant District Attorney of New York  
22 County Cyrus Vance Jr., the Plaintiff Julia Sorokin was subjected to emotional, physical and economic  
23 suffering, as is more fully alleged above in 1-143 of this complaint.

**COUNT 16**

**42 U.S.C § 1983 - CONSPIRACY AND CONFLICT OF INTEREST**

**(Defendant former District Attorney of New York Robert Morgenthau)**

202. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

203. Robert Morgenthau, former head of the District Attorney's Office was acting in conspiracy and conflict of interest by starting a malicious investigation and malicious prosecution of an innocent California resident Plaintiff Julia Sorokin. This was done on the request of the Dow Jones & Company, who owns the Wall Street Journal. The Former District Attorney Robert Morgenthau was a frequent writer for the Wall Street Journal, and had a vested interest in protecting the Wall Street Journal business interest.

204. The Former District Attorney Robert Morgenthau has retired after 35 years of public service and quickly secured a position with Wachtell, Lipton, Rosen & Katz. This law firm provides legal counsel to the Bancroft family, who are the original owners of the Dow Jones & Co. Inc and the Wall Street Journal. The new employment at this law firm by the former District Attorney Robert Morgenthau demonstrates that he was acting in conspiracy and in conflict of interest by prosecuting an innocent California resident, Plaintiff Julia Sorokin over a civil website domain dispute, which is not a crime.

205. As a result of this act of conspiracy and conflict of interest by the Defendant, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

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**COUNT 17**

**42 U.S.C § 1983 - INTENTIONAL MISREPRESENTATION**

**(District Attorney Office of New York County libel press release)**

206. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

207. On December 17<sup>th</sup>, 2008, hours before the Plaintiff Julia Sorokin's arraignment, the Defendant former District Attorney Robert Morgenthau posted a written press release on the District Attorney's Office website. This libel press release was made up of statements that are known to be false by Defendant former District Attorney Robert Morgenthau.

208. The District Attorney's Office of New York County then sent this press release to the Dow Jones news feed service who then translated it into several languages, and distributed it to major media outlets around the United States and around the world. This action was done by the Defendants at the District Attorney's Office of New York County in order to destroy the Plaintiff Julia Sorokin's character before court proceedings began and ensuring the Plaintiff Julia Sorokin could not get a fair trial.

209. As a result of this intentional act of misrepresentation by the Defendants at the District Attorney's Office of New York County, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

**COUNT 18**

**42 U.S.C § 1983 – VIOLATION OF DUE PROCESS**

**(Failure to read Miranda warnings during police interrogations under custody)**

210. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

211. The Defendants:

1 1. The New York Police Department

2 2. NYPD Detective Terrance Hayes

3 never read the Plaintiff Julia Sorokin her Miranda Warnings at anytime during:

4 1. Her kidnapping outside of her home at 101 Market Street, San Diego California.

5 2. During her interrogation by San Diego County Sheriff's Detectives Julio Sandoval and Carlos  
6 Vasquez in their unmarked vehicle without a female officer present.

7 3. During Defendant NYPD Detective Terrance Hayes interrogations without her attorney.

8  
9 212. The Miranda warnings must have been given to the Plaintiff Julia Sorokin since she was in  
10 custody and being asked questions first by the Detectives Carlos Vasquez and Julio Sandoval in  
11 California and then by Defendant NYPD Detective Terrance Hayes in New York. The Plaintiff Julia  
12 Sorokin was also forced to speak with several members of the District Attorney's staff without the  
13 presence of her attorney.  
14

15 213. As a result of the Defendants failure to read to the Plaintiff Julia Sorokin her Miranda  
16 warnings, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is  
17 more fully alleged above in 1-143 of this complaint.  
18

19 **COUNT 19**

20 **42 U.S.C § 1983 - VIOLATION OF SIXTH AMENDMENT RIGHTS**

21 **(Denying of access to an attorney during unlawful prison detention in two states)**

22 214. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

23 215. The Defendants:

24 1. The New York County District Attorney's Office

25 2. Former New York County District Attorney Robert Morgenthau  
26  
27  
28

1 3. Assistant District Attorney Joanne Siegmund

2 4. The New York City Police Department

3 5. NYPD Detective Terrance Hayes

4 never allowed the Plaintiff Julia Sorokin access to her attorney since they arrested her on a sealed  
5 governor's warrant. They kept her arrest a secret from her attorney, and detained her for two and a half  
6 weeks in two prisons in two different states before she could speak to her attorney. Plaintiff Julia  
7 Sorokin went directly into criminal court proceedings without speaking to her attorney in both states.  
8

9 216. As a result of the violation of the Sixth Amendment by the Defendants, the Plaintiff Julia  
10 Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in  
11 1-143 of this complaint.  
12

13  
14 **COUNT 20**

15 **42 U.S.C § 1983 - VIOLATION OF SIXTH AMENDMENT RIGHTS**

16 **(Delaying of trial in order to gain a tactical advantage)**

17 217. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

18 218. The Defendants:

19 1. The New York County District Attorney's Office

20 2. Former New York County District Attorney Robert Morgenthau

21 3. Assistant District Attorney Joanne Siegmund

22 4. The New York City Police Department

23 5. NYPD Detective Terrance Hayes

24 violated the Plaintiffs Julia Sorokin's Sixth Amendment right to a speedy and public trial by:

25 1. Arresting the Plaintiff Julia Sorokin six months after the false police report was filed.  
26  
27  
28

1 2. Detaining the Plaintiff for three weeks in two prisons in two different states without stating  
2 her charges or names of the victims or witnesses of a crime.

3 3. Delaying discovery by not releasing the grand jury minutes in a timely manner and blocking  
4 the Plaintiff Julia Sorokin's ability to prepare for a speedy and public trial.

5 219. The entire process lasted for over a year; from police report filed on May 31st 2008 to the  
6 last court date July 8th 2009.

7  
8 220. In *Strunk v. United States*, 412 U.S. 434 (1973), the Supreme Court ruled that if the  
9 reviewing court finds that a defendant's right to a speedy trial was violated, then the indictment must be  
10 dismissed and/or the conviction overturned. The Court has held that, since the delayed trial itself is the  
11 state action which violates the defendant's rights, no other remedy would be appropriate. Thus, a  
12 reversal or dismissal of a criminal case on speedy trial grounds means that no further prosecution for  
13 the alleged offense can take place.

14  
15 221. As a result of the violation of the Sixth Amendment by the Defendants, the Plaintiff Julia  
16 Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in  
17 1-143 of this complaint.

18  
19 **COUNT 21**

20 **42 U.S.C § 1983 - VIOLATION OF SIXTH AMENDMENT RIGHTS**

21 **(Refusal to present accusers or victims of a crime)**

22 222. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

23 223. The Defendants:

24 1. The New York County District Attorney's Office

25 2. Former New York County District Attorney Robert Morgenthau  
26  
27  
28

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**COUNT 23**

**42 U.S.C § 1983 - MALICIOUS PROSECUTION**

**(Placing excessive bail restrictions on a California resident)**

228. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

229. The Defendants:

1. The New York County District Attorney's Office
2. Former New York County District Attorney Robert Morgenthau
3. Assistant District Attorney Joanne Siegmund

demand that the Plaintiff Julia Sorokin be forced to stay in New York City during court proceedings was excessive, since the Plaintiff Julia Sorokin had not committed any crime in New York. The Plaintiff Julia Sorokin is a California resident, who was not a fugitive from New York as the Defendants alleged. Plaintiff Julia Sorokin had no home in New York State, which made her homeless in New York for over six months.

230. This action was excessive and used as a tactic under color of law by the Defendants. This action was done so that the Plaintiff Julia Sorokin would not be able to return to her home in San Diego, California out of the legal jurisdiction of the Defendants.

231. As a result of excessive bail restrictions imposed by the Defendants, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

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**COUNT 24**

**42 U.S.C § 1983 - MALICIOUS PROSECUTION**

**(Unlawful Criminal Prosecution of a Civil Business Dispute)**

232. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

233. The Defendants:

1. The New York County District Attorney's Office
2. Former New York County District Attorney Robert Morgenthau
3. Assistant District Attorney Joanne Siegmund
4. The New York City Police Department
5. NYPD Detective Terrance Hayes

acted under color of law by conducting an unlawful criminal prosecution of a civil business dispute between the Dow Jones Co. and the Plaintiff Julia Sorokin's corporations Crystal Clear Media LLC and Perfect Vision Media LLC.

234. The Defendants had no jurisdiction or authority to assist the Dow Jones and Co. gain a tactical advantage over the Plaintiff Julia Sorokin, a California business owner, who did not commit a crime in New York. The Defendants were acting in conspiracy, as well as out of their scope of employment and under color of law.

235. As a result of these actions by the Defendants, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

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**COUNT 25**

**42 U.S.C § 1983 - FILING A FALSE POLICE REPORT**

**(Police report with no victims or location of a crime in New York)**

236. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

237. The Defendants:

1. The New York County District Attorney's Office
2. Former New York County District Attorney Robert Morgenthau
3. Assistant District Attorney Joanne Siegmund
4. The New York City Police Department
5. NYPD Detective Terrance Hayes

acted under color of law by filing a false police report against the Plaintiff Julia Sorokin on May 31st 2008, at the 5th NYPD precinct, which is across the street from the District Attorney's Office of New York County. The Police report stated no victims or location of a crime and was filed by the Defendants, not a victim or witness to a crime.

238. As a result of filing a false police report by the Defendants, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

**COUNT 26**

**42 U.S.C § 1983 – MALICIOUS PROSECUTION**

**(Presenting newspapers as human victims of aggravated personal identity theft)**

239. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

240. The Defendants:

1 1. The New York County District Attorney's Office

2 2. Former New York County District Attorney Robert Morgenthau

3 3. Assistant District Attorney Joanne Siegmund

4 acted under color of law by presenting newspapers as human victims of aggravated personal identity  
5 theft who reside in New York City, NY.  
6

7 241. The Defendants also stated that website urls and business emails that the Plaintiff Julia  
8 Sorokin legally owned were pieces of personal identifying information that she stole from the  
9 newspapers, who they said were people residing in New York.

10 242. The Defendants are acting under color of law by presenting newspapers as people victims  
11 of aggravated personal identity theft, and by stating that these "victims" reside in New York.

12 243. As a result of these actions under color of law by the Defendants, the Plaintiff Julia  
13 Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in  
14 1-143 of this complaint.  
15

16  
17 **COUNT 27**

18 **42 U.S.C § 1983 – CONSPIRACY AGAINST RIGHTS WITH MALICE**

19 **(Malicious entrapment of the Plaintiff Julia Sorokin)**

20 244. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

21 245. The Defendants:

22 1. The New York City Police Department

23 2. NYPD Detective Terrance Hayes

24 3. The New York County District Attorney's Office

25 4. Former New York County District Attorney Robert Morgenthau  
26  
27  
28

1           5. Assistant District Attorney Joanne Siegmund

2 maliciously conspired against the Plaintiff Julia Sorokin rights by entrapping the Plaintiff Julia Sorokin  
3 by not letting her know she is under indictment during their conversation prior to the kidnapping.

4           246. This conversation took place when the Plaintiff Julia Sorokin called the Defendant NYPD  
5 Detective Terrance Hayes on her cell phone from her home at 101 Market Street, San Diego, California  
6 on or about November 15th, 2008. Defendant NYPD Detective Terrance Hayes told the Plaintiff Julia  
7 Sorokin she does not need to come to New York City with her attorney.

8           247. During their conversation, Defendant NYPD Detective Terrance Hayes lied to the Plaintiff  
9 Julia Sorokin and told her she was a victim of identity theft, rather than doing his duty as a police  
10 officer, and informing her that she has been indicted, and has a warrant out for her arrest.

11           248. The Plaintiff Julia Sorokin was then subjected to enormous physical and emotional abuse  
12 that could have been prevented by the Plaintiff Julia Sorokin going to New York with her attorney and  
13 challenging the false charges without the three week unlawful imprisonment and kidnapping.

14           249. As a result of malicious actions by the Defendants, the Plaintiff Julia Sorokin was  
15 subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this  
16 complaint.

17  
18  
19  
20                                   **COUNT 28**

21                                   **42 U.S.C § 1983 - VIOLATION OF DUE PROCESS RIGHTS**

22                                   **(Deliberate withholding of exculpatory evidence)**

23           250. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

24           251. The Defendants:

25           1. The New York County District Attorney's Office  
26  
27  
28

## 42 U.S.C § 1983 – FALSE IMPRISONMENT

**(Defendants deliberate hiding of Plaintiff Julia Sorokin for two weeks in a California prison)**

**255. Plaintiffs repeat 1-131 of this complaint as if restated fully here.**

### 256. The Defendants:

1. The New York County District Attorney's Office
2. Former New York County District Attorney Robert Morgenthau
3. Assistant District Attorney Joanne Siegmund
4. NYPD Detective Terrance Hayes
5. The New York City Police Department

1 illegally and under color of law hid the Plaintiff Julia Sorokin for two weeks in the Las Colinas Women  
2 Detention Center in Santee California while the Defendants figured out a way to convict her on false  
3 charges in New York City, NY.

4       257. This tactic of hiding the Plaintiff Julia Sorokin out of reach of her attorney and under a  
5 sealed governor's warrant gave the Defendants the time they needed to hide the grand jury minutes, the  
6 police report with no victims and the additional fabricated charges as well as the fact that the Plaintiff  
7 Julia Sorokin is an innocent California resident who did not commit the crime of aggravated identity  
8 theft in New York State.

9  
10       258. As a result of this false imprisonment by the Defendants, the Plaintiff Julia Sorokin was  
11 subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this  
12 complaint.

13  
14  
15                   **COUNT 30**

16                   **42 U.S.C § 1983 – PROSECUTOR MISCONDUCT**

17                   **(Denial of the right to testify before the Grand Jury of New York City, NY)**

18       259. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

19       260. The Defendants:

- 20       1. The New York County District Attorney's Office  
21       2. Former New York County District Attorney Robert Morgenthau  
22       3. Assistant District Attorney Joanne Siegmund  
23       4. The New York City Police Department  
24       5. NYPD Detective Terrance Hayes  
25  
26  
27  
28

1 denied the Plaintiff Julia Sorokin her right to testify and be present with her attorney during the Grand  
2 Jury proceedings.

3 261. The Defendants did this to gain a tactical advantage due to the fact that if the Plaintiff Julia  
4 Sorokin could have shown the Grand Jury that her corporations own the emails and website urls in  
5 question and that she is a San Diego, CA resident, she could never have been indicted.

6  
7 262. In New York State, the target of an investigation has a right to testify before the Grand  
8 Jury. In fact, if the prosecution violates this right and presents the case to the Grand Jury, a judge may  
9 dismiss the indictment and require that the prosecution re-present the case to the Grand Jury to allow  
10 the defendant to testify.

11 263. In 1978, the New York state passed a law that allows a defense lawyer to accompany the  
12 target of an investigation into the grand jury room.

13  
14 264. As a result of the denial of testifying to the Grand Jury by the Defendants, the Plaintiff  
15 Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged  
16 above in 1-143 of this complaint.

17  
18 **COUNT 31**

19 **42 U.S.C § 1983 - VIOLATION OF EIGHTH AMENDMENT RIGHTS**

20 **(Withholding of food and water during the three day pre-arraignment detention)**

21 265. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

22 266. The Defendants:

- 23  
24 1. The New York City Police Department  
25 2. NYPD Detective Terrance Hayes  
26 3. The New York City Department of Corrections  
27

1 subjected the Plaintiff Julia Sorokin to cruel and unusual punishment by not providing any food or  
2 water during the three day pre-arraignment detention by Defendant NYPD Detective Terrance Hayes.

3 267. Defendant NYPD Detective Terrance Hayes used this tactic as punishment against the  
4 Plaintiff Julia Sorokin for refusal to speak without her attorney present.

5 268. As a result of this cruel and unusual punishment conducted by the Defendants, the Plaintiff  
6 Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged  
7 above in 1-143 of this complaint.  
8

9  
10 **COUNT 32**

11 **42 U.S.C § 1983 - VIOLATION OF EIGHTH AMENDMENT RIGHTS**

12 **(Denial of a bed or a shower to the Plaintiff Julia Sorokin for three days)**

13 269. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

14 270.. The Defendants:

15 1. The New York City Department of Corrections

16 2. The New York City Police Department

17 3. NYPD Detective Terrance Hayes

18  
19 subjected the Plaintiff Julia Sorokin to cruel and unusual punishment by not providing a bed or a  
20 shower to the Plaintiff Julia Sorokin for three days from the pickup of the Plaintiff Julia Sorokin in San  
21 Diego, CA on December 16th 2008 until the Plaintiff Julia Sorokin to received housing at Rikers Island  
22 Correctional Facilities the night of December 19th 2008.

23  
24 271. The Plaintiff Julia Sorokin had to endure three days of sleeping on benches, chairs, and  
25 floors with no shower while being three months pregnant.

26 ///

COUNT 33

**(Refusal to release the Plaintiff Julia Sorokin's belongings after posting bail)**

274. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

**275. The Defendants:**

1. The New York County District Attorney's Office
2. Former New York County District Attorney Robert Morgenthau
3. Assistant District Attorney Joanne Siegmund
4. The New York City Police Department
5. NYPD Detective Terrance Hayes

released the Plaintiff Julia Sorokin from Rikers Island Correctional Facilities at midnight without any of her belongings such as money, identification, etc. The Plaintiff Julia Sorokin needed these items to seek medical care, housing and purchase winter clothing.

276. The Defendants never handed the Plaintiff Julia Sorokin's property back due to the fact that Defendant NYPD Detective Terrance Hayes never turned them into the Rikers Island Correctional Facilities. Defendant NYPD Detective Terrance Hayes kept all of the Plaintiff Julia Sorokin's

1 belongings that were supposed to be released to her in his desk at the District Attorney's Office of New  
2 York County.

3 277. The Plaintiff Julia Sorokin was refused care from four New York City hospitals due to the  
4 fact she did not have any form of identification to provide to the admitting nurse. These hospitals are  
5 Bellevue Hospital Center, Metropolitan Hospital Center, Elmhurst Hospital Center, and Queens  
6 Hospital Center.  
7

8 278. Without identification the Plaintiff Julia Sorokin ran the risk of once again being arrested  
9 in New York City by multiple New York Police Check Points created after the September 11th terror  
10 attacks that unconstitutionally request that citizens that enter the multiple check points to show  
11 identification and be subjected to a search without probable cause.  
12

13 279. The Defendants were forced to hand over one of Plaintiff Julia Sorokin's identification  
14 three months after the arrest by the presiding Judge, after numerous requests by the Plaintiff Julia  
15 Sorokin and her defense attorney.

16 280. As a result of this act of denial of property and malicious prosecution conducted by the  
17 Defendants, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as  
18 is more fully alleged above in 1-143 of this complaint.  
19

20  
21 **COUNT 34**

22 **42 U.S.C § 1983 - VIOLATION OF EIGHTH AMENDMENT RIGHTS**

23 **(Subjecting the Plaintiff Julia Sorokin to perform labor instead of providing medical care)**

24 281. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

25 282. The Defendant the New York City Department of Corrections subjected the Plaintiff Julia  
26 Sorokin to cruel and unusual punishment by forcing the Plaintiff Julia Sorokin to clean a janitorial  
27  
28

1 room / area on of December 24th 2008 instead of providing the Plaintiff Julia Sorokin with access to a  
2 doctor for medical care.

3 283. The Plaintiff Julia Sorokin had to miss her afternoon meal due to the fact that a Rikers  
4 Island Correction Officer forced her to clean a janitorial room / area while other inmates were attending  
5 the afternoon meal session.

6 284. The Plaintiff Julia Sorokin was told on Friday December 19th 2008 she will be allowed to  
7 see a doctor, but was never taken to see one after suffering her miscarriage. The Plaintiff Julia Sorokin  
8 after waiting six days for medical treatment was then forced to perform labor before she could be given  
9 a meal and prepare for her release later that night.

10 285. As a result of this cruel and unusual punishment conducted by the Defendant, the Plaintiff  
11 Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged  
12 above in 1-143 of this complaint.  
13  
14

15  
16 **COUNT 35**

17 **42 U.S.C § 1983 - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

18 **(Unlawful prison detention without stating charges)**

19 286. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

20 287. The Defendant:

- 21 1. The New York County District Attorney's Office
- 22 2. Former New York County District Attorney Robert Morgenthau
- 23 3. Assistant District Attorney Joanne Siegmund
- 24 4. The New York City Police Department
- 25 5. NYPD Detective Terrance Hayes
- 26
- 27
- 28

288. The Plaintiff Julia Sorokin suffered for weeks without knowing what crime she had done or how long would she be in prison. Corrections Officers at Rikers Island Correctional Facility further subjected the Plaintiff Julia Sorokin to intentional infliction of emotional distress by telling the Plaintiff Julia Sorokin that only major criminals get extradited on sealed governor's warrants.

289. The Plaintiff Julia Sorokin suffered additional intentional infliction of emotional distress during her extradition, prison intake process in two prisons, and malicious prosecution.

290. As a result of this intentional infliction of emotional distress conducted by the Defendants, the Plaintiff Julia Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this complaint.

## 42 U.S.C § 1983 – FALSE ARREST

**(No probable cause or jurisdiction to conduct the arrest in San Diego, California)**

291. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

## 292. The Defendants:

1. The New York County District Attorney's Office
2. Former New York County District Attorney Robert Morgenthau
3. Assistant District Attorney Joanne Siegmund
4. The New York City Police Department

1 5. NYPD Detective Terrance Hayes

2 6. The New York Attorney General's Office

3 conducted a false arrest of the Plaintiff Julia Sorokin by not having probable cause or jurisdiction to  
4 conduct the arrest of Plaintiff Julia Sorokin in San Diego, California.

5 293. As a result of this act conducted by the Defendants, Plaintiff Julia Sorokin was subjected to  
6 illegal, improper, and false arrest by defendants and taken into custody and caused to be falsely  
7 imprisoned, detained, and confined, without any probable cause, or legal jurisdiction.  
8

9 294. As a result of this false arrest conducted by the Defendants, the Plaintiff Julia Sorokin was  
10 subjected to emotional, physical and economic suffering, as is more fully alleged above in 1-143 of this  
11 complaint.  
12

13  
14 **COUNT 37**

15 **42 U.S.C § 1983 – DENIAL OF CONSTITUTIONAL RIGHTS TO FAIR TRIAL**

16 **(Denying access to review the Grand Jury minutes for trial preparation)**

17 295. Plaintiffs repeat 1-143 of this complaint as if restated fully here.

18 296. The Defendants:

19 1. The New York County District Attorney's Office

20 2. Former New York County District Attorney Robert Morgenthau

21 3. Assistant District Attorney Joanne Siegmund  
22

23 denied the Plaintiff Julia Sorokin the right to review the Grand Jury minutes that would have proven  
24 that the Defendants at the District Attorney's Office of New York County never had a victim of a crime  
25 which is clearly illustrated in the police report.

26 ///

1 297. As a result of this act conducted by the Defendants at the District Attorney's Office of New York  
2 County, Plaintiff Julia Sorokin and her defense attorney were blocked from preparing an adequate  
3 defense to address the false criminal allegations.

4 298. The Defendants at the District Attorney's Office of New York County have stated that they  
5 will never allow anyone to review the Grand Jury minutes after the presiding Judge Ronald A. Zweibel  
6 questioned the Defendant Assistant District Attorney Joanne Siegmund on the lack of jurisdiction and  
7 having no victims of personal identity theft in New York.

8 299. The Defendants at the District Attorney's Office of New York County therefore violated  
9 Plaintiff Julia Sorokin's constitutional rights to a fair trial under the Fifth and Fourteenth Amendments  
10 of the United States Constitution.

11 300. As a result of this violation of the Plaintiff Julia Sorokin's constitutional rights to fair trial  
12 conducted by the Defendants at the District Attorney's Office of New York County, the Plaintiff Julia  
13 Sorokin was subjected to emotional, physical and economic suffering, as is more fully alleged above in  
14 1-143 of this complaint.  
15  
16

17  
18 **PRAYER FOR RELIEF**

19 WHEREFORE, Plaintiffs Julia Sorokin and Plaintiff Louis A. Bravo respectfully request that  
20 this court enter judgment in favor of the Plaintiffs and against the Defendants listed in this complaint  
21 and award the Plaintiffs:  
22

23 1. A permanent injunction ordering Defendant Cyrus Vance Jr., in his official capacity as  
24 District Attorney of New York County and all of his officers, agents, servants, employees, and  
25 attorneys, and those persons in active concert or participation with him from engaging in the unlawful  
26 prosecution of the Plaintiff Julia Sorokin.  
27  
28

1           2. The immediate removal of the false and incriminating Plaintiff Julia Sorokin's press release  
2 on the District Attorney's of New York County's website.

3           3. The immediate return of all properties belonging to the Plaintiff Julia Sorokin. Items are:  
4 bible, cell phone, purse, and all documents including documents taken from Plaintiffs home in San  
5 Diego, CA.

6           4. The immediate removal of all criminal photos and finger prints taken of the Plaintiff Julia  
7 Sorokin.

8           5. An immediate review by the New York State Attorney General's Office and the District  
9 Attorney's Office of New York County of all personal identity theft criminal indictments that have  
10 been prosecuted by the Defendant Assistant District Attorney of New York County Joanne Siegmund.

11           6. An immediate criminal investigation by the New York State Attorney General's Office and  
12 the District Attorney's Office of New York County of Defendant NYPD Detective Terrance Hayes for  
13 filing a false police report and kidnapping the Plaintiff Julia Sorokin under color of law from her home  
14 at 101 Market Street San Diego California.

15           7. An immediate request by the New York State Attorney General's Office and the District  
16 Attorney's Office of New York County for the disbarment of the Defendant Assistant District Attorney  
17 of New York County Joanne Siegmund by the New York State Bar Association.

18           8. The Plaintiffs be awarded against all the Defendants, jointly and severally exemplary  
19 damages in the amount of \$200,000,000.00 (Two Hundred Million U.S Dollars)

20           9. The Plaintiffs be awarded against all the Defendants, jointly and severally compensatory  
21 damages in the amount of \$200,000,000.00 (Two Hundred Million U.S Dollars)

22           10. The Plaintiffs be awarded interest, the cost of disbursements and legal fees of this action,  
23 and such other and further relief, as the court may seem just and proper.

**JURY TRIAL DEMANDED**

Respectfully submitted:



DATED: 05.25.2010

Julia Sorokin Pro Se  
Plaintiff  
3895 Clairemont Drive, Suite B # 210  
San Diego, CA  
Email: ljemail2010@aol.com  
Tel: 858 384 3528; Fax: 858 384 3581



DATED: 05/25/2010

Louis A. Bravo Pro Se  
Plaintiff  
3895 Clairemont Drive, Suite B # 210  
San Diego, CA  
Email: ljemail2010@aol.com  
Tel: 858 384 3528; Fax: 858 384 3581

# EXHIBIT - A

Plaintiff Julia Sorokin's Police Report  
with no victims of a crime.



# EXHIBIT - B

Plaintiff Julia Sorokin's NY Indictment  
with no victims of a crime.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

-against-

Julia Sorokin (AKA Victoria Gleizer, Nancy Gold,  
Kelly Armstrong, Meredith Taylor)

Defendant.

Port 41- 50,000  
Bail 50,000

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuse the defendant of the crime of **IDENTITY THEFT IN THE FIRST DEGREE**, in violation of Penal Law §190.80(1), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about May 10, 2007 to on or about March 5, 2008, knowingly and with intent to defraud assumed the identity of another person, to wit, The Wall Street Journal, by presenting herself as that other person, and by acting as that other person, and by using personal identifying information of that other person and thereby obtained money in an aggregate amount that exceeded two thousand dollars.

**SECOND COUNT:**

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant of the crime of **IDENTITY THEFT IN THE FIRST DEGREE**, in violation of Penal Law §190.80(3), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about May 10, 2007 to on or about March 5, 2008, knowingly and with intent to defraud assumed the identity of another person, to wit, The Wall Street Journal, by presenting herself as that other person, and by acting as that other person, and by using personal identifying information of that other person and thereby committed and attempted to commit a class D felony or higher level crime, and acted as an accessory in the commission of a class D or higher level felony.

THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant of the crime of **IDENTITY THEFT IN THE FIRST DEGREE**, in violation of Penal Law §190.80(1), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about October 8, 2007 to on or about July 31, 2008, knowingly and with intent to defraud assumed the identity of another person, to wit, The New York Times, by presenting herself as that other person, and by acting as that other person, and by using personal identifying information of that other person and thereby obtained money in an aggregate amount that exceeded two thousand dollars.

FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant of the crime of **IDENTITY THEFT IN THE SECOND DEGREE**, in violation of Penal Law §190.79(3), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about October 8, 2007 to on or about July 31, 2008, knowingly and with intent to defraud assumed the identity of another person, to wit, The New York Times, by presenting herself as that other person, and by acting as that other person, and by using personal identifying information of that other person and thereby committed and attempted to commit a felony and acted as an accessory to the commission of a felony.

ROBERT M. MORGENTHAU  
District Attorney

# EXHIBIT - C

Plaintiff Julia Sorokin's  
NY Pre-trial decision stating that  
newspapers are "persons" who reside in  
New York for the sake of jurisdiction.

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JACOBS COHEN

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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: PART 41

-----x  
THE PEOPLE OF THE STATE OF NEW YORK, :

Indictment Number 5257/08

-against- :

JULIA SOROKIN (a/k/a VICTORIA GLEIZER,;  
NANCY GOLD, KELLY ARMSTRONG,  
MEREDITH TAYLOR,;

: Decision & Order

Defendant. :

-----x  
ZWEIBEL, J.:

Defendant's omnibus motion is disposed of as follows:

1. The motion for inspection and/or dismissal of the Grand Jury minutes is granted to the extent that the Court has examined the Grand Jury minutes in camera and found the evidence before the Grand Jury to be legally sufficient, the instructions to be proper and the proceeding to be unimpaired. The issues in the defendant's motion are straightforward, and disclosure of the Grand Jury minutes is not necessary to their resolution (see CPL § 210.30[3]). Accordingly, the motion to dismiss the indictment is denied.

Defendant also claims that this Court lacks jurisdiction to prosecute her for the crimes of Identity Theft in the First (3 counts) and Second Degree (1 Count) as the geographic nexus needed to sustain any of these counts does not exist. The Court disagrees.

At common law and under the State Constitution, a defendant has the right to be tried in the county where the crime was committed unless the Legislature has provided otherwise (see People v. Zimmerman, 9 N.Y.3d 421, 426 [2007]). "So stringently was that rule applied, at common law, that where the alleged act was performed in part in one county and in part in another or others, venue was in neither county and prosecution could not be had at all" (People v. Zimmerman, 9 N.Y.3d, at 427, quoting Matter of Murtagh v. Leibowitz, 303 N.Y. 311, 316 [1951]). The Legislature sought to correct that situation by enacting venue statutes that permit the prosecution of certain actions in other counties under certain very specific conditions (see People v. Zimmerman, 9 N.Y.3d, at 427; Matter of Murtagh v. Leibowitz, 303 N.Y., at 316). CPL 20.40(4)(1) is one such exception.

CPL 20.40 (4)(1)(iii) specifically states that "[a]n offense of identity theft or unlawful possession of personal identification information may be prosecuted ... in the county where the person whose personal identification information was used in the commission of the offense resided at the time of the commission of the offense".

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JACOBS COHEN

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When the bills preceding enactment of the statutes in the Penal law dealing with identity theft were considered by the Legislature, the Legislature acted while knowing that New York State was second only to California in numbers of identity theft complaints, and that existing statutes were inadequate to address a swiftly expanding problem with serious financial consequences (see New York State Assembly Mem. in Support, 2002 McKinney's Session Laws of N.Y., at 2093). Recognizing identity theft as a major new criminal trend, the New York State passed L. 2002, ch. 619, which created the new crimes of identity theft and unlawful possession of personal identification information. The Legislature, cognizant of the potential problem in prosecuting these crimes due to the multijurisdictional nature of each element of the crime, also amended the jurisdictional venue statute to permit identity theft crimes to be prosecuted not only where the crime took place, but also gave concurrent jurisdiction in any county where the person who suffered financial loss or whose information was used resided at the time the crime took place.

Despite the fact that the incidence of identity theft have grown since the statutes were passed in 2002, jurisdiction does not appear to have been an issue in any of the reported cases. Thus, this Court has no guidance from prior caselaw on the issue of whether New York County has jurisdiction under the facts of this case. However, it is clear that this case of first impression is the type of multijurisdictional nightmare that the legislature was attempting to prevent by amending CPL 20.40(4)(1).

Based on a literal reading of CPL 20.40(4)(1), both the New York Times and The Wall Street Journal are "persons" for jurisdiction purposes (see Penal Law § 10.00[7]). There was testimony before the Grand Jury that both "reside[d]" in New York County during the period in question. Clearly, the papers personal information was used as defendant used the names and e-mail addresses of both entities respectively.

Specifically, as to the Wall Street Journal, defendant established an online domain incorporating the name Wall Street Journal: "wallstreetjournaladonline.com". Through this domain, defendant solicited advertisers by sending a letter offering promotional advertising and editorial input. The letter is signed by the "Advertising Manager, wsj.com". The authentic website of The Wall Street Journal is "WSJ.com". The invoice sent to the advertiser bears The Wall Street Journal banner in large print on top of the document.

As to the New York Times, defendant established several online domains incorporating the name New York Times: "newyorktimesadvertising.com", "nytimesadvertisingonline.com" and "nytimesasonline.com". Through each domain, defendant solicited

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JACOBS COHEN

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advertisers and distributed promotional material carrying the signature of "Advertising Manager, nytimes.com." The authentic website of The New York Times is "nytimes.com." The invoice sent to the advertiser bears The New York Times banner in large print on top of the document. Additionally, defendant endorsed two checks made out to The New York Times and deposited them into her own account.


The Court also notes that the People specifically charged the Grand Jury as to jurisdiction (see People v. Zimmerman, 9 N.Y.3d 421, 426 [2007]).

Finally, the Court finds no merit to defendant's argument that she did not steal any real person's identity. She stole the identity of The New York Times and The Wall Street Journal both explicitly and by implication. Accordingly, despite her aliases, defendant is not a pseudonymous person. Defendant apparently forgets that a company/corporation is considered a person under Penal Law §10.00(7).

Accordingly, the evidence of venue/jurisdiction was sufficient.

2. The motion for a Bill of Particulars and Discovery is granted to the extent supplied by the People. However, if defendant believes that any response to his demand for Discovery or his request for a Bill of Particulars is inadequate, he may move to reargue within 10 days of the service of a copy of this Pretrial Decision and Order. The People are directed to preserve all evidence including electronically recorded matter and physical exhibits seized by law enforcement officials or their agents, and all notes, records memoranda and reports prepared by law enforcement officials or their agents, including all recorded police communications.
3. The People are reminded of their continuing obligation under Brady v. Maryland, 373 U.S. 83 (1963).
4. The motion to reserve his right to make any and all further motions is denied.

ENTER:

  
Ronald A. Zweibel, J.S.C.

Dated: June 11, 2009

# EXHIBIT - D

Wachtell, Lipton, Rosen & Katz the new employers of Defendant Robert Morgenthau press release naming the Dow Jones and Company Inc. and the Bancroft Family as clients of the law firm during Plaintiff Julia Sorokin's criminal prosecution.

# WACHTELL, LIPTON, ROSEN & KATZ

THE FIRM • PRACTICE • ATTORNEYS • RECRUITING • ABOUT THIS SITE

CORPORATE  
LITIGATION  
RESTRUCTURING  
AND FINANCE  
TAX  
EXECUTIVE  
COMPENSATION  
AND BENEFITS  
ANTITRUST  
REAL ESTATE

A Preeminent Corporate Practice. Wachtell Lipton regularly handles many of the largest, most complex and demanding transactions in the United States and around the world. We counsel both public and private acquirors and targets, advising on a wide range of corporate matters, including

- U.S., Cross-Border and International Mergers and Acquisitions
- Private Equity and Strategic Investments
- Spin-offs and Split-ups
- Securities Offerings and Other Capital Raising Transactions

In addition, Wachtell Lipton is recognized as a leading firm for

- takeover defense
- shareholder activism
- corporate governance

We also counsel companies, and their boards of directors, on corporate disclosure, governance and policy issues.

Our clients include enterprises of virtually every nature, in the United States and around the world, including financial institutions, securities and private equity firms, and industrial, healthcare, pharmaceutical, technology, energy and media companies, including many *Fortune* 500 companies and other leading enterprises.

**Creativity in Service of Our Clients.** Wachtell Lipton has repeatedly contributed to major evolutions in corporate law in order to advance the interests of its clients. Among other things, Wachtell Lipton originated the so-called "poison pill"; structured the first cross-border "Morris Trust" transaction, between SmithKline Beckman and Beecham; and has been involved in the transactions giving rise to most of the landmark corporate governance decisions in Delaware, including the *Household*, *Revlon*, *Newmont Mining*, *Macmillan*, *Interco*, *Time Warner*, *QVC* and *IBP* decisions.

**Examples of Our Work.** Wachtell Lipton consistently ranks at the very top rank of legal advisors by transaction dollar volume, notwithstanding that all of our major competitors are significantly larger than we are. Over the past eight years, we have been the legal advisor on 7 of the 10 largest transactions in the United States and 5 of the 10 largest transactions

globally, as well as numerous other acquisition and restructuring transactions across many industries and of every description. Following are examples of some of our recent activity in a variety of areas.

**Recent major U.S. M&A representations have included:**

- Schering-Plough in its \$41 billion acquisition by Merck
- Wyeth's board of directors in the pending acquisition of Wyeth by Pfizer for \$68 billion
- Rohm and Haas in its \$18.8 billion sale to Dow Chemical
- Bank of America in its \$19 billion acquisition of Merrill Lynch
- The United States Department of the Treasury in connection with the conservatorship of, and \$100 billion contingent equity investment in, each of Fannie Mae and Freddie Mac
- Wells Fargo in its \$15 billion acquisition of Wachovia Corporation
- JPMorgan Chase in its acquisition of Bear Stearns
- • Bancroft Family in News Corp.'s \$5.6 billion acquisition of Dow Jones & Co.
- CenturyTel, Inc. in its \$11.6 billion merger with EMBARQ
- BEA Systems in its \$8.5 billion sale to Oracle
- ConocoPhillips in its \$35 billion acquisition of Burlington Resources
- Delta Air Lines Inc. in its \$3.6 billion merger with Northwest Airlines Corporation
- ALLTEL in its \$27 billion LBO by Goldman Sachs and TPG and its \$28.1 billion sale to Verizon Wireless
- Apollo Management and Texas Pacific Group in their \$27.8 billion buyout of Harrah's Entertainment
- Goldman Sachs, AIG, Carlyle and Riverstone Holdings, in their \$22 billion buyout of Kinder Morgan.

**Recent major cross-border or non-U.S. M&A representations have included:**

- Alcoa Inc in its \$1.2 billion joint venture with Aluminum Corporation of China with respect to an investment in Rio Tinto plc
- Morgan Stanley in its \$9 billion sale of equity securities to Mitsubishi UFJ Financial Group
- Acciona in its €42.5 billion acquisition of Endesa in partnership with Enel
- Bank of America in its \$21 billion acquisition of ABN Amro's LaSalle Bank, in connection with the €70 billion acquisition of ABN Amro
- Iscar in its \$5 billion acquisition by Berkshire Hathaway
- Unocal in its acquisition by Chevron for \$16.6 billion, and in

JS 44 (Rev. 12-07)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

## I. (a) PLAINTIFFS

Julia Sorokin  
Louis A. Bravo

(b) County of Residence of First Listed Plaintiff San Diego, CA  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

JULIA SOROKIN, Pro Se 3895 Clairmont Drive, Suite B#210 Telephone: (858) 384-3528  
LOUIS A. BRAVO, Pro Se San Diego, CA 92117 Facsimile: (858) 384-3581

DEFENDANTS **2010 MAY 27 PM 2:50**

NEW YORK COUNTY DISTRICT ATTORNEY'S OFFICE: Cyrus Vance Jr. in his official capacity as DISTRICT ATTORNEY OF NEW YORK COUNTY; Robert Morgenthau in his former official capacity as DISTRICT ATTORNEY OF NEW YORK COUNTY; Jeanine Higgins in her official capacity as ASSISTANT DISTRICT ATTORNEY OF NEW YORK COUNTY; CITY OF NEW YORK; NEW YORK CITY POLICE DEPARTMENT; Terrance Hayes in his official capacity as NYD Detective; CORRECTIONS DEPARTMENT OF NEW YORK CITY; NEW YORK STATE ATTORNEY GENERAL'S OFFICE

County of Residence of First Listed Defendant New York, NY  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorney (If Known)

**10 CV 115 3WQH****BLM**

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                                   |   | PTF                        | DEF                                   |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1            | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5            |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Tort to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	

## V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from another district (specify)  
☐ 6 Multidistrict Litigation  
☐ 7 Appeal to District Judge from Magistrate Judgment

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C. § 1983

Brief description of cause:

This action is brought pursuant to 42 U.S.C. § 1983 to redress violations of constitutional rights by the defendants.

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

\$400,000,000

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

May 26, 2010

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # 13997

AMOUNT \$350

5/27/10 134

APPLYING IFP

JUDGE

MAG. JUDGE

Court Name: USDC California Southern  
Division: 3  
Receipt Number: CAS013997  
Cashier ID: bhartman  
Transaction Date: 05/27/2010  
Payer Name: KNOX ATTORNEY SERVICES

CIVIL FILING FEE  
For: SOROKIN AND BRAVO V NEW YORK  
Case/Party: D-CAS-3-10-CV-001153-001  
Amount: \$350.00

PAPER COPIES  
For: SOROKIN AND BRAVO V NEW YORK  
Amount: \$1.50

CHECK  
Check/Money Order Num: 6881  
Amt Tendered: \$351.50

Total Due: \$351.50  
Total Tendered: \$351.50  
Change Amt: \$0.00

There will be a fee of \$45.00  
charged for any returned check.